





MAR 30 2005

United States
Department of
Agriculture

Food and
Nutrition
Service

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Dear State Cooperators:

I am pleased to present to you, the State Food Stamp Nutrition Education (FSNE) Plan Guidance for fiscal year (FY) 2006. As in FY 2005, this Guidance includes templates and information for States on how to ensure an expeditious review process. I encourage you to review this document carefully before drafting your State FSNE Plan. Regional Food and Nutrition Service (FNS) staff are available to provide technical assistance to State agencies regarding the preparation of State FSNE plans and reports. State agencies are responsible for ensuring that any sub-grantees follow this guidance and implement approved activities accordingly.

States should submit to FNS a State FSNE plan on or before the August 15 deadline. We are again requesting both an electronic and a paper copy of State plans (including final reports). If FNS deems that changes to the State plan are necessary before final approval is granted, the State must incorporate these changes into their State plan document and resubmit the revised paper and electronic copies to FNS. States are not guaranteed reimbursement of funds for FSNE activities until they have received approval from FNS for activities described in the State's FY 2006 plan. This approval is always contingent on the availability of Federal funds.

As promised, this Guidance does not incorporate any principles specific to the draft FSNE Framework posted for public comment during FY 2004. However, FNS has updated this Guidance to incorporate policy clarifications and reflect the new Dietary Guidelines for Americans released in early 2005 and the forthcoming USDA Food Guidance System. FNS has also revised this Guidance to provide greater clarity on key issues. These changes include the use of the term "Food Stamp Program eligibles" rather than "Food Stamp Program participants and applicants" when referring to the intended FSNE target audience.

These Guidance changes are summarized on the attached *2006 Guidance Highlights*. The FY 2006 Guidance, with marked changes from 2005, will be available on the Food Stamp Nutrition Connection website by March 31, 2005. You may access it at:
http://www.nal.usda.gov/foodstamp/National_FSNE.html.

Throughout the year, please feel free to comment on this Guidance through your FNS regional contacts. We are happy to consider your views and welcome suggestions for improvement.

Sincerely,

Karen J. Walker

Director

Program Accountability Division, FSP

2006 Guidance Change Highlights

These highlights briefly summarize some of the changes to the Fiscal Year (FY) 2006 Food Stamp Nutrition Education Plan Guidance. This summary is not comprehensive and does not list or discuss changes in detail. States should thoroughly review the actual FY 2006 Guidance before submitting their FY 2006 Plan.

1. The Food Stamp Nutrition Education Target Audience

During FY 2005, FNS reassessed legislative intentions and communications of agency policy regarding the target audience of Food Stamp Nutrition Education (FSNE). Concurrently, comments generated during draft FSNE Framework public comment period clearly indicated a fair degree of confusion among States and their subcontracted FSNE providers regarding policy on who could and should receive FSNE.

The FY 2006 FSNE Plan Guidance includes a modified section called Identifying and Understanding the Target Audience. This revision is designed to:

- a) more closely align language in the FSNE Plan Guidance with that stated in the Food Stamp Act, as amended;
- b) facilitate States' ability to identify the intended target audience in community settings; and
- c) clarify the meaning of audience-related terms such as "food stamp eligibles" and "target audience".

A key change related to the FSNE target audience is the use of the term "food stamp eligibles" in lieu of the term "food stamp participants and applicants" when referring to the FSNE target audience. The Food and Nutrition Service (FNS) defines Food Stamp Program (FSP) eligibles as persons that meet criteria for participation in the FSP as described in Federal legislation and regulations. Food stamp participants and applicants are encompassed in this definition as noted in the bullet describing Certified Eligibles below. The 2006 Guidance describes the likelihood of reaching the intended target audience (i.e., FSP eligibles) when FSNE is delivered to certain groups:

- Certified Eligibles. Persons that participate in the formal FSP certification process (e.g., FSP participants) are the only persons known with certainty to meet criteria for participation in the Program. As such, FSP participants, who consist of over 25 million of the nation's neediest people, are at the core of FSNE efforts. State FSNE efforts should be designed and implemented in a manner that maximizes the number of FSP participants reached and their potential for behavior change.
- Likely Eligibles. Many low-income people that are eligible for the Program do not apply. Since non-participating eligibles have not gone through the formal FSP certification process, they are not as easy to identify. To facilitate the delivery of FSNE to non-participating eligibles, FNS is allowing FSNE providers to use gross income levels at or below 130% of the poverty guidelines as a proxy measure for FSP eligibility. States may provide FSNE to persons meeting this proxy criterion without requesting a waiver of Program exclusivity regulations. This is allowed

because persons with incomes less than 130% of poverty guidelines are generally likely to be eligible for the Program. Such persons may be identified by virtue of participation in another means-tested program. Details regarding this proxy criterion are more fully described in the FY 2006 Guidance.

- Potentially Eligible by Site/Location. Activities delivered to persons at venues serving generally low-income persons where at least 50% of persons have gross incomes at or below 185% of the poverty guideline/threshold provide a fair likelihood of benefiting food stamp eligibles. An exclusivity waiver is required and, as in the past, certain conditions must be met to provide FSNE activities in this manner. Since FSNE is intended to provide nutrition education to FSP eligibles, States should consider these waivers only after making a clear effort to provide FSNE to persons that are certified eligibles (e.g., FSP participants) or likely eligibles (by proxy). Even projects with an approved waiver should focus on reaching FSP eligibles and maximizing changes in their behavior. An updated waiver request template has been added that is consistent with the FSP waiver request outline.

2. Incorporation of the 2005 Dietary Guidelines for Americans and the New Food Guidance System

The U.S. Department of Agriculture (USDA) and the Department of Health and Human Services (DHHS) released, on January 12, 2005, the sixth edition of Nutrition and Your Health: Dietary Guidelines for Americans (DGA). The FY 2006 FSNE Plan Guidance acknowledges these new DGAs as the basis for nutritional standards and educational messaging for the FSP. States should review their FSNE interventions, social marketing campaigns and materials to ensure that they support and facilitate diets consistent with the 2005 DGAs and food guidance system. States can review the 2005 DGAs and forthcoming USDA Food Guidance System (anticipated Spring 2005) on the Center for Nutrition Policy and Promotion website at <http://www.cnpp.usda.gov>. FNS recognizes that States may need to update and reprint materials. This effort will benefit from cooperation and collaboration across State FNS programs. This time of revision and updating provides a unique opportunity to ensure that our FSNE messages are consistent with those of other FNS programs and are developed to promote behavior change in the food stamp eligible audience. During the upcoming year, States are encouraged to monitor materials being produced by the Federal government and State FSNE providers so that efforts are not unnecessarily duplicated and to ensure that FSNE funds are used to produce quality materials in areas where they are needed most. The Food Stamp Nutrition Connection, an online FSNE resource system, will continue to serve as the communication hub for FSNE providers, disseminating information on new materials as they become available and providing a place for the sharing of ideas and strategies. The Connection is available at <http://www.nal.usda.gov/foodstamp>.

3. Plan Amendment Deadline

The 2006 State FSNE Plan Guidance notifies States that plan amendments featuring reimbursement requests for new or substantially revised FSNE activities must be submitted to FNS no later than June 30 of the current FY. Submission by this date is necessary to ensure adequate time for FNS review and approval and State implementation of the proposed activities before the end of the FY.

4. Incorporation of Policy Memorandums

Policy communicated through memorandums dated April 22, 2004 and September 17, 2004 is incorporated in this Guidance. This policy pertains to in-kind donations and paid staff time.

5. FSNE Project Staffing

FNS has revised State FSNE Plan Guidance on project staffing to provide for a clear description of the number of staff being proposed, how job duties benefit food stamp eligibles, and the amount of Federal reimbursement being requested. This is crucial to FNS plan approvals and minimizes the need for FNS to request additional information. Starting in FY 2006, States are asked to provide the Full Time Equivalents (FTE) that will be funded through FSNE. A revised optional template is provided.

6. Development of FSNE Materials

Starting in FY 2006, all materials developed or printed using FSNE funds must include a brief message about how the FSP can help provide a healthy diet and how to apply for benefits. This is a slight change from past years when this message was only required on materials used with persons not currently participating in the FSP. This change ensures communication regarding the link between FSP benefits and a healthy diet. Since FSNE materials are increasingly shared among States, inclusion of this message on all materials supports the broader use of quality materials for relevant audiences.

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Food and Nutrition Service Nutrition Education

The U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) is committed to improving the nutrition and health of low-income Americans and to assisting in meeting the Healthy People 2010 nutrition and related objectives for the nation (www.healthypeople.gov/). The FNS vision statement emphasizes this commitment: To lead America in ending hunger and improving nutrition and health.

The FNS mission is to increase food security and reduce hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthful diet, and nutrition education in a manner that supports American agriculture and inspires public confidence.

FNS administers 15 nutrition assistance programs that touch the lives of one in five Americans each year, with the potential to make an important difference in the lives of children and low-income populations by promoting food security, reducing hunger, and improving nutritional status. Please check the FNS web site (www.fns.usda.gov/fns/) for more information on these programs. In conjunction with State and local partnerships, FNS programs also hold great potential to influence food choices and to support healthy eating and related nutrition behaviors.

Effectiveness of nutrition education can be greatly enhanced through collaboration and coordination with all FNS programs and others interested in promoting health and nutrition in low-income populations. Consider capitalizing on the services of community groups, including faith-based organizations, and existing service coalitions at the community level. They can assist in referrals to nutrition education, in providing transportation or in offering facilities for nutrition education sessions to the low income people they reach on a regular basis.

Collaboration and coordination can result in delivery of more uniform messages targeting key community nutrition issues. FNS strongly encourages working together to plan, develop and implement more comprehensive, family-centered nutrition education interventions that reach multiple members of the household through a variety of program channels.

Food Stamp Nutrition Education (FSNE)

Goal

The goal of Food Stamp Nutrition Education (FSNE) is to improve the likelihood that persons eligible for the Food Stamp Program (FSP) will make healthy food choices within a limited budget and choose active lifestyles consistent with the current Dietary Guidelines for Americans and USDA Food Guidance System.

FSNE is intended to help households eligible for the FSP:

- adopt healthy eating and active lifestyles that are consistent with the current Dietary Guidelines for Americans and USDA Food Guidance System. (Dietary Quality)
- enhance practices related to thrifty shopping and preparation of nutritious foods. (Shopping Behavior/Food Resource Management)
- have enough to eat without resorting to emergency food assistance and, if not already participating in the FSP, be aware of its benefits and how to apply for them. (Food Security)
- safely handle, prepare and store food. (Food Safety)

These four “core elements” form the basic range of educational categories in FSNE.

State Food Stamp Nutrition Education Plan

Introduction

This document provides guidance to State agencies regarding Fiscal Year (FY) 2006 FSP State nutrition education plans. Specifically, it:

- assists with the preparation of the State nutrition education plan;
- provides templates for complete and efficient plan submission (Appendix A);
- describes reporting requirements for activities covered by the plan (Appendix B);
- serves as a reference for policy regarding allowable costs and other policy issues (Appendix C);
- provides definitions of key terminology (Appendix D) and abbreviations (Appendix E);
- encourages use of the “Food Stamp Nutrition Connection”, a USDA Web-based nutrition education resource for educators (Appendix F);
- and provides a timeline for FY 2006 planning and reporting (Appendix G).

This guidance is meant to provide information on FSNE in conjunction with OMB Circulars, FSP regulations and policy memorandums. Due to the diversity of FSP nutrition education activities, a comprehensive listing of all allowable and unallowable costs is not practical. All final judgments on what activities and expenses are “reasonable and necessary” are a Food and Nutrition Service (FNS) determination. Please refer to the information on allowable costs in Appendix C as you plan your activities for the upcoming FY.

Nutrition Education Plan Submission and Approval Process

Under current FSP regulations at 7 CFR 272.2 (d), State FSP agencies have the option to provide nutrition education. State FSP agencies seeking Federal funding for FSNE must annually submit a State nutrition education plan to FNS for approval. Two copies of the plan should be submitted to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM). If FNS deems that changes to the State plan are necessary before final approval is granted, the State must incorporate these changes into their State plan document and resubmit the revised paper and electronic copies to FNS.

State Agency Liability

State agencies are accountable for the contents of their nutrition education plan. They are responsible for making allowable cost determinations and are fully liable for repayment of Federal funds should those costs later be determined unallowable. FNS regional office financial management and program staff are available to provide technical and other assistance to State agencies in developing nutrition education plans. The State agency is responsible for providing technical assistance to any sub-grantees to ensure that all projects support the State’s FSNE goals and objectives and to clarify which expenses are eligible for reimbursement through the FSP.

Submission Deadlines

As specified under 7 CFR 272.2 (e) of the regulations, officials of the State agency must sign the FSNE Plan and submit it to the FNS regional office annually no later than August 15 for the following Federal FY's operation. States may submit a plan prior to the August 15 deadline and early submission is highly encouraged. Two copies of the plan should be submitted to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM). If FNS deems that changes to the State plan are necessary before final approval is granted, the State must incorporate these changes into their State plan document and resubmit the revised paper and electronic copies to FNS. Refer to the Plan Approval section below on requested formatting.

A final report on the previous year's activities is due annually by November 30. Submit two copies of the report to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM). Contingent approvals for the upcoming FY may be made pending receipt of the final report. FNS reserves the right to withhold final approval of the subsequent year's plan pending receipt of this final report.

A timeline for the submission process is located in Appendix G.

Plan Approval

Plans that are incomplete, filled with extraneous unnecessary information, or poorly organized impede the review process and can result in a denial or delayed approvals. To expedite approval, FNS recommends that the State agency do the following:

- ☑ Review the plan carefully to assure that it is consistent with the current Guidance. Both State agency program staff and the fiscal officer should review the plan to verify that all activities and costs are allowable, reasonable and necessary for the delivery of FSNE.
- ☑ Construct necessary waiver requests carefully and provide thorough justification and documentation.
- ☑ Use the recommended templates provided in Appendix A. These templates are designed to ensure that necessary information is included and can be easily presented in your plan. These templates are also available electronically at http://www.nal.usda.gov/foodstamp/National_FSNE.html.
- ☑ Incorporate local project plans and reports into a single State plan and report.
 - Describe all FSNE activities in your State using the recommended templates. Submit only one State plan and report even though multiple State sub-grantees

may exist. Do not submit separate plans and reports for each sub-grantee in your State. For example, your plan should include one unified section describing the identified needs of the Food Stamp population in your State, FSNE goals and objectives for the State, etc. Demonstrate that local projects support State goals and objectives and provide the requested details concerning each project's implementation, evaluation and budget.

- ☑ Limit the length of your State plan to not more than 150 pages excluding appendices and limit your final report to 50 pages excluding appendices. Use at least a twelve-point font, one-inch margins and number the pages of your plan. Provide clear and concise descriptions and justifications for the requested items.
- ☑ Verify that State officials have signed and dated the plan.
- ☑ Submit your Plan to your FNS Regional Office early (prior to the August 15th due date).
- ☑ Submit the previous year's final report to FNS by the November 30th due date.

Final Report Deadline Extension

By written request to the FNS Regional Office, States may ask to extend the deadline for Part I of the Plan (the Final Report). FNS reserves the right to withhold final approval of plans pending receipt of the Final Report.

Plan Amendments

State agencies must submit amendments to their plans to FNS for prior approval whenever there are increases in budget or changes in the scope of activities in an approved plan (see Appendix C: Cost Policy). If plan amendments for the current FY include reimbursement requests for new or substantially revised FSNE activities, States must submit them to FNS, complete with supporting documentation, **no later than June 30 of the current FY**. Submission by this date is necessary to ensure adequate time for review, approval and implementation of the proposed activities during the remaining three months of the FY. Two copies of the plan amendment should be submitted to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM). Refer to the Plan Approval section on pages 11-12 for requested formatting.

Management Evaluation Review of State FSNE Projects

Regions select State FSNE projects for on-site review based on one or more of the following factors:

- amount of expenditures over the past FY relative to other States in the Region with similar population demographics and program scope.

- the quality of sample documentation used by the State agency to support reimbursements from the State agency to subcontractors.
- rate of increase in the expenditures from one FY to the next;
- known or suspected difficulties in program administration or operation;
- and length of time since the State's FSNE services were last examined.

This review will assess whether:

- operations are consistent with the terms of the approved plan;
- activities are targeted to participating and potentially eligible FSP clients;
- projects are being evaluated for effectiveness;
- sources of State matching funds are allowable and not used as match for other Federal programs;
- administrative expenses are reasonable, necessary and properly documented and allocated; and
- States are submitting developed materials to the National Agricultural Library, Food and Nutrition Information Center for inclusion on the Food Stamp Nutrition Connection Web site.

Focus of Food Stamp Nutrition Education

State plans should include behaviorally focused, science-based nutrition education interventions, projects or social marketing campaigns that fall within the focus of FSNE and are consistent with FNS priorities. The focus of FSNE is:

- Health promotion (helping people to establish healthy eating habits and an active lifestyle).
- Primary prevention of diseases (helping people who have risk factors for diet-related chronic disease prevent or postpone the onset of disease by establishing more active lifestyles and healthier eating habits).

The Dietary Guidelines for Americans are the foundation for science-based nutrition education in all FNS nutrition assistance programs. Therefore, messages delivered through FSNE must be consistent with the Dietary Guidelines for Americans (USDA, 2005) and the associated Food Guidance System (USDA, 2005). Please refer to the USDA Center for Nutrition Policy and Promotion website <<http://www.cnpp.usda.gov/>> for complete information on the Dietary Guidelines for Americans and the Food Guidance System.

Nutrition Education Core Elements

Four core elements further outline the topical areas of FSNE: Dietary Quality, Food Resource Management/Shopping Behaviors, Food Security, and Food Safety. States should focus on these core elements when preparing their annual plan for nutrition education. States should especially emphasize the core element Dietary Quality and address it in a comprehensive manner. FNS is particularly interested in efforts directed at increasing the consumption of

fruits and vegetables in **FSP eligible** population and interventions and activities that promote healthy weight through the balance of healthy eating and active living. Descriptions of the core elements are provided in Table I (page 14).

Coordination and Collaboration

The likelihood of nutrition education messages successfully changing behaviors is increased when consistent and repeated messages are delivered through multiple channels. Cross-program coordination and collaboration at the State and community levels includes working together toward a common goal to reinforce and amplify each other's efforts. Collaborative projects necessitate commitments of staff support and time, as well as cost sharing among all involved entities. In their FSNE Plan, States should describe how they are working with other FNS nutrition programs to consistently deliver behavior focused nutrition messages. **Written agreements (e.g., Memorandums of Understanding)** are needed for all collaborative projects (see Part II, Section B. Goals, Objectives, Strategies and Coordination). **These agreements must be signed by a representative of each agency/organization participating in the collaboration.**

TABLE I. FOOD STAMP NUTRITION EDUCATION CORE ELEMENT DESCRIPTIONS

Core Element	Definition
Dietary Quality	Applies to the nutritional value of food acquired and how well overall diets of food stamp eligibles compare to the current Dietary Guidelines for Americans and USDA Food Guidance System . Physical activity falls within this element with certain restrictions (see Appendix C for more information).
Shopping Behavior/Food Resource Management	Applies to the practices related to thrifty shopping for and management of food dollars. These include such skills as making shopping lists, reading labels for nutritional value, planning menus and basic cooking.
Food Security	Applies to the general well-being of a household in terms of assured access to an adequate supply of food at all times in order to support a healthy, active life. This includes a readily available supply of nutritious and safe foods and the assured ability to acquire these foods in a socially acceptable manner. Promotion of participation in the Food Stamp Program to eligible nonparticipating persons as part of nutrition education is a critical aspect of this element (see Appendix C: Section C.4 for additional guidance related to Outreach).
Food Safety	Applies to how food is handled. For example, it deals with issues such as hand washing, the length of time food may be left without refrigeration, the temperature at which food should be stored and whether food is properly and fully cooked.

Guidance for State Plan Preparation

The following section provides guidelines for completing your nutrition education plan. The plan consists of two parts: Part I asks you to report on FY 2005 activities, and Part II asks you to report on FY 2006 planned activities. For the convenience of State agencies, we have provided optional templates in Appendix A for use in reporting information requested in this plan guidance. We strongly recommend the use of these templates since omitted, incomplete or poorly organized information will delay nutrition education plan review and approval or result in a denial. Prior to writing your plan, review all guidance carefully to ensure that your plan meets basic requirements.

Part I. Final Report of FY 2005 Nutrition Education Activities

Summarize the nutrition education projects specified in your FY 2005 Plan. This final report is due to your FNS regional office by November 30, 2005. Additional information regarding submission deadlines may be found on page 11.

Section A. State Nutrition Education Report Summary

This section of the report is designed to provide a summary of all FY 2005 FSNE in your State. In table format (see Template 1, Appendix A), summarize your State nutrition education projects and social marketing campaigns. A project is a discrete unit of nutrition education intervention at the local level. A social marketing campaign is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior (see full definitions in Appendix D). The following information should be included in your report summary by project or social marketing campaign:

1. Name of project or campaign (should correspond with the project name in your 2005 plan).
2. Geographical areas reached (cities, counties or statewide).
3. Type and number of delivery sites (list the type and number of locations where classes were delivered, not the number of times classes were delivered). For example, list the number of unique congregate meal sites where classes were delivered in the State.
4. Length of any social marketing campaigns (i.e., number of months).
5. Description of the audience to whom the project was delivered.
6. Primary nutrition education methods (number and duration of one-on-one counseling sessions, social marketing campaigns, group classes, etc.).
7. Core element(s) covered
8. Key message(s).
9. Type of evaluation (formative, process or impact).

Section B. Contact Summary Data

In table format (see Appendix A: Optional Plan and Report Templates, Template 2), provide the number of contacts with audiences reached through FY 2005 FSNE for each project as well as aggregated State totals. Report contacts made through direct and indirect (including social marketing) activities. States may report contacts with persons or households; however, reporting the number of contacts with persons is preferred. If available, we highly encourage States to report contacts with FSP participants or FSP households specifically as well as the total number of contacts.

1. **Direct Contacts-** refers to the number of face-to-face contacts via one-on-one counseling or group/classroom education. Please specify whether you are reporting contacts with persons or households.
 - o If available, provide the number of contacts with **FSP participants or FSP households** made through direct FSNE activities. For example, if a FSP participant attends 8 FSNE classes, record 8 contacts.
 - o Also, provide the number of contacts with **all persons or households** made through direct FSNE activities. For example, if 10 people attend all 8 classes, record 80 contacts.
2. **Indirect Contacts** are made through the delivery of nutrition education to a household or a person through an indirect and generalized strategy, such as health fairs, waiting room brochures, Web-based modules, newsletters, and social marketing campaigns. Please specify whether you are reporting contacts with persons or households.
 - o If available, provide the number of contacts with **FSP participants or FSP households** made through indirect FSNE activities. For example, if a FSP participant receives 8 newsletters, report 8 contacts.
 - o Provide the number of contacts with **all persons or households** made through indirect FSNE activities. For example, if a radio PSA is played two times to an estimated listening audience of 8,000 low-income persons, report 16,000 contacts.

Part II. Proposed FSNE for Year 2006

Section A. Identifying and Understanding the Target Audience

The Food Stamp Act, as amended, indicates that nutrition education activities should be directed to persons eligible for the FSP. FSP eligibles are persons that meet criteria for participation in the FSP as described in Federal legislation and regulations. Henceforth, use of the term “target audience” in this document will refer to FSP eligibles according to this definition (see also Appendix D: Definitions). Food stamp participants and applicants are

encompassed in this definition as noted in the Certified Eligibles category described in Table II (page 18) and the following paragraph.

Persons that participate in the formal FSP certification process (e.g., FSP participants) and are determined eligible are the only persons known, with certainty, to meet criteria for participation in the Program. As such, FSP participants, who consist of over 25 million of the nation's neediest people, are at the core of FSNE efforts. **State FSNE efforts should be designed and implemented in a manner that maximizes the number of FSP participants reached and their potential for behavior change.**

Many low-income people that are eligible for the Program do not apply. Since non-participating eligibles have not gone through the formal FSP certification process, they are not as easy to identify. To facilitate the delivery of FSNE to non-participating eligibles, FNS is allowing FSNE providers to use gross income levels at or below 130% of the poverty guidelines as a proxy measure for FSP eligibility. Generally, States may provide FSNE to persons meeting this proxy criterion without requesting a waiver of Program exclusivity regulations because the likelihood of FSP eligibility is high for all FSNE recipients. However, persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students-see Appendix C) are exceptions to this proxy criterion.

In addition to the direct provision of FSNE to certified eligibles or those eligible by proxy, States can request exclusivity waivers for FSNE projects that may inadvertently reach ineligible persons because:

- It is not practical to separate out FSP eligibles from a group of low-income persons.
- It is not possible to ascertain FSP eligibility even when using the proxy measure.

Projects for which waivers are requested must be delivered to a generally low-income audience, with at least 50% of persons having gross incomes at or below 185% of the poverty guidelines/thresholds. Appendix C, Section A.3 provides further instruction on requesting exclusivity waivers. **Since FSNE is intended to provide nutrition education to FSP eligibles, States should consider these waivers only after making a clear effort to provide FSNE to persons that are certified eligibles or likely eligibles (by proxy).**

Overall, State FSNE plans should clearly show how the target audience will benefit from FSNE activities and demonstrate that resources are used in a way that maximizes FSNE benefits for the target audience. Table II characterizes the potential audiences for State FSNE activities and describes the likelihood that the audience reached will be the intended target audience of FSP eligibles. Under circumstances described in Appendix C: Section A.17, FNS may allow prorated costs that reflect FSNE's share of the total costs associated with nutrition education that reaches a broader audience than those described in Table II on page 18.

Table II. Audiences for Food Stamp Nutrition Education

	Audience	Likelihood of Reaching Food Stamp Eligibles	Examples	Waiver Needed*
1.	Certified Eligibles Includes persons currently participating in or applying for the FSP. <i>This is the known FSP target audience.</i>	FSNE activities delivered to this audience clearly benefit FSP eligibles.	<ul style="list-style-type: none"> Persons referred by the local FSP office. Persons reached through direct marketing to FSP participants. Persons participating in the Food Distribution Program on Indian Reservations (FDPIR; see Appendix C, Section A.3). 	No
2.	Likely Eligibles Persons not falling into category 1 above that have gross incomes at or below 130% of poverty guidelines. It does not include persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students-see Appendix C). This is a proxy measure of FSP eligibility for FSNE.	FSNE activities delivered to this audience are very likely to benefit FSP eligibles. Partnerships are needed with other programs that have formal means-tested certification processes and/or similar income participation criteria.	<ul style="list-style-type: none"> Income eligible persons referred by WIC, Medicaid, or Child Nutrition Programs. Persons receiving Supplemental Security Income (SSI) or Temporary Assistance for Needy Families (TANF; see Appendix C, Section A.3 for more details on categorical eligibility). 	No
3.	Potentially Eligible by Site/Location Persons at venues serving generally low-income persons where at least 50% of persons have gross incomes at or below 185% of poverty guidelines/thresholds.	FSNE activities delivered to this audience provide a fair likelihood of benefiting FSP eligibles by providing services in sites/locations primarily frequented by a low-income audience. This audience may be used when it is not possible or practical to separate out Program eligibles and/or identify Program eligibility (e.g., social marketing campaigns). FSNE delivered to this audience should still be designed to meet the needs of FSP eligibles.	<ul style="list-style-type: none"> Persons residing in census tract areas where at least 50% of persons have gross incomes that are equal to or less than 185% of the poverty threshold. Children in schools where at least 50% of children receive free and reduced priced meals. Persons participating in the WIC program. 	Yes

*Exclusivity waivers are needed when FSNE projects will inadvertently reach persons that may be ineligible for the FSP (see Appendix C).

Section A of your State FSNE Plan should describe the target audience in your State and your assessment of their needs. Necessary components of this section of your Plan are outlined below and an optional template (Template 3) is provided in Appendix A.

1. **Describe and justify your methodology for assessing the needs of the target audience in your State and report your findings.** States should first gather needs assessment data from existing data (secondary data collection). Primary data collection (focus groups, surveys, and key informant interviews) may occasionally be needed to fill in gaps identified in secondary data collection. States must clearly describe and justify any proposed primary data collection and identify the anticipated product. This formative research must supplement (not duplicate) existing data and directly relate to the implementation/delivery of FSNE. Additional information on the collection of needs assessment data is available in *Needs Assessment Resource Manual: A Guide for State Nutrition Education Networks* (US Department of Agriculture, Food and Nutrition Service, 1997) at <http://www.fns.usda.gov/oane/MENU/Published/nutritioneducation/Files/NeedsAssmt-Man.pdf>

When available, the following information should be addressed in this section of your plan:

- a. Demographic characteristics of the target audience in your State. Examples of characteristics that may help you plan and deliver FSNE effectively include: geographic location (i.e., areas and neighborhoods where FSP eligibles reside, FSP participation rates, income-relevant census tract information, location of public housing, etc.), race/ethnicity, age, gender, family composition, education and primary language.
 - b. Nutrition-related behavioral and lifestyle characteristics of the target audience in your State. Examples of characteristics that may enhance your ability to develop, target, and deliver FSNE messages include dietary and food purchasing attitudes and habits as well as where and how FSP eligibles eat, redeem food stamp benefits, live, learn, work and play.
 - c. Availability of other nutrition-related programs, services, and social marketing campaigns that target low-income populations in your State (e.g., WIC, Team Nutrition, EFNEP, food banks, public health services). This information will help you identify potential partners for message collaboration and avoid duplication of existing services. State contact information for FNS programs is available at: <http://www.fns.usda.gov/oane/SNAP/SNAPMap.htm>
 - d. Areas of the State where the target audience is underserved or has not had access to FSNE previously. States are encouraged to reflect on how well previous FSNE efforts served the State target audience.
2. **Based on your needs assessment above and the current availability of other nutrition education services, describe and justify how you will reach the target**

audience and what priority areas you will address through FSNE. For instance, your State may wish to focus FSNE efforts on improving fruit and vegetable consumption in FSP households with children. Note that all areas and strategies used to address identified issues must fall within the scope and focus of FSNE. Indicate which issues you addressed in FY 2005 and which ones you plan to address in FY 2006.

Section B. Goals, Objectives, Strategies and Coordination

Template 3 in Appendix A will assist you in completing this section. List your behavioral goals and objectives and the educational strategies and vehicles you will use to achieve them.

1. **For the priority areas you described** in Section A, identify State nutrition education goals and measurable objectives. Your goals should illustrate the overall purpose of FSNE activities. A well-written and clearly defined objective is **S.M.A.R.T.:**
 - a. **Specific.** It identifies a specific event or action that will take place.
 - b. **Measurable.** It quantifies the amount of change to be achieved.
 - c. **Appropriate.** It is logical and relates to the State's FSNE goals.
 - d. **Realistic.** It is realistic given available resources and the proposed FSNE activities.
 - e. **Time specific.** It specifies a time by which the objective will be achieved. These objectives should be completed within the FY of the plan.

Examples of S.M.A.R.T. objectives include:

- By September 30, 2007, increase the consumption of fruits and vegetables among women and children participating in the FSP statewide by 5% and 3%, respectively, through the delivery of an intensive multi-channel intervention targeting this segment of food stamp population. (State level objective)
- After participating in two or more FSNE activities on label reading, adults will be able to identify foods low in saturated fat, trans fat and cholesterol. (local project objective)
- After 6 1-hour classes, FSNE participants will increase their average daily consumption of dark green vegetables by ½ cup per day. (local project objective)

Your goals and objectives should be conceptually linked at State and local levels. Project level objectives should not be selected in isolation, but should support State FSNE goals.

2. **For each objective listed above,** describe the **nutrition education** methods and strategies that will be used to achieve it. **Provide the following:**

- Specify how you will implement the project, giving particular attention to: how and where it will be delivered, its duration, the projected number of contacts with FSP eligibles and the frequency of contacts (number of classes, mailings, billboards, etc.), key educational messages, core elements covered and any segmentation of the target audience. Describe any social marketing strategies for the development and dissemination of educational interventions.
 - A brief summary of existing research supporting the effectiveness and feasibility of your nutrition education methods.
 - A justification for adapting or changing an identified intervention/project method or strategy.
3. Identify existing educational materials that you plan to use in the delivery of the intervention/project. Note if they are in languages other than English. FNS recommends that States use existing FNS materials (such as Team Nutrition, Loving Support, and Eat Smart. Play Hard.™) instead of purchasing or reprinting other materials that target the same audience.
 4. Identify any new materials that you plan to produce. To maximize resources and avoid duplication of effort, State agencies must assess existing materials prior to developing new materials for nutrition education efforts (see number 3 above). Existing materials, especially existing FNS materials such as Team Nutrition, Loving Support, and Eat Smart. Play Hard.™, must be used and/or adapted whenever possible rather than developing new materials. The following collections of nutrition education resources are available to help States search for existing materials:

- Food Stamp Nutrition Connection (see also Appendix F)
www.nal.usda.gov/foodstamp
- Eat Smart. Play Hard.™
www.fns.usda.gov/eatsmartplayhard/
- WIC Works Resource System
www.nal.usda.gov/wicworks/
- Team Nutrition
www.fns.usda.gov/tn

Describe your findings and justify why the development of any new materials is needed. If you plan to develop new materials, refer to “Important Notes About Materials” on page 23.

5. For each objective, provide performance measures or indicators of expected outcome. For example, change in behavior (ate one additional vegetable per day) or improvement in cooking skills (learned how to properly cook dry beans or peas).

6. For each objective, describe your evaluation plans. Evaluation is important for accountability, planning, and learning how to continuously refine and improve nutrition education for the target audience to achieve positive behavior outcomes. The following three types of evaluation are appropriate and may be included in your State plan:

- Formative-which can involve pre-testing of draft nutrition education materials to answer questions about whether materials are understandable, relevant, credible and acceptable to the target audience;
- Process-which can involve such measures as tracking the number of materials distributed, the number of clients reached, effectiveness of alternate methods of delivering nutrition education and/or barriers to implementing the intervention;
- and Outcome or Impact-to learn how effective the intervention was in changing the target populations' attitudes, awareness or behavior.

Evaluation efforts must have direct applications for FSNE delivery and ultimately benefit the target audience through project/intervention improvement. For information about program evaluation, FNS recommends the following guidance:

- Journal of Nutrition Education: 33, Supplement 1, 2001
- Evaluating Social Marketing in Nutrition: A Resource Manual
<http://www.fns.usda.gov/oane/menu/published/nutritioneducation/Files/evalman-2.PDF>
- WIC Evaluation Resource Guide
<http://www.fns.usda.gov/oane/MENU/Published/WIC/FILES/WICEvaluationResourceGuide.pdf>

7. Describe efforts to coordinate, complement and supplement other FNS programs in order to deliver consistent behavior-focused nutrition messages.

- Specifically address your collaborative efforts with FNS Programs in your State (WIC, Child Nutrition programs, etc.), and describe your involvement in developing the State Nutrition Action Plan (SNAP). Outline any objectives/tasks related to the SNAP that FSNE will lead or conduct during the next year.
- School interventions should include a description of ongoing collaboration efforts with the State's Department of Education and local school administration.
- If FSNE will be delivered in coordination with another agency (i.e., WIC, Department of Education, food bank, etc.), the State must submit, with their plan, a copy of a written agreement (e.g., a Memorandum of Understanding) that clearly outlines the responsibilities of all collaborating agencies and is signed by all agencies.

Important Notes About Materials

- States must ensure that all nutrition messages conveyed as a part of FSNE are consistent with the goal, focus, and core elements of FSNE as described on pages 9, 13-14 of this Guidance. FSNE funds may not be used to convey negative written, visual, or verbal expressions about any specific foods, beverages, or commodities. This includes messages of belittlement or derogation of such items, as well as any suggestion that such foods, beverages, or commodities should never be consumed (see Appendix C). FNS regional office staff may ask to review media messages and materials prior to their release, particularly when States are planning large media campaigns and productions.
- FNS reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, computer programs such CD-ROMs and related source codes, literature, or other products produced, in whole or in part, with FSP funds for government purposes. For more information, see Appendix C.
- Curricula must focus on improving the dietary quality of the target audience and should contain related activities as a way of promoting health and preventing diet-related diseases. Materials with subject matter that is beyond the scope of FSNE, including the screening for diseases and the treatment and management of diseases, are not allowable.
- We encourage States to submit their materials to the Food Stamp Nutrition Connection Web site so that all may benefit. Appendix F provides detailed information about the Food Stamp Nutrition Connection.
- Materials developed or reprinted with FSP funds must include the following non-discrimination statement:

“In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs or disability.”

“To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.”

Note: There are no print size requirements when the statement above is used. If the material is too small to permit the full statement to be included, the material must, at a minimum, include the statement, in print size no smaller than the text, that “This institution is an equal opportunity provider and employer.”

- Credit must be provided to the FSP as a funding source. This credit line must appear on newly developed materials and reprinted materials. The following statements are recommended:
 - English: “This material was funded by USDA's Food Stamp Program.”

- Spanish: “Este material se desarrolló con fondos proporcionados por el Programa de Cupones para Alimentos del Departamento de Agricultura de los EE.UU. (USDA para sus siglas en inglés). “
- A brief outreach message about the FSP must be provided on **all** newly developed or reprinted materials. The following statements are recommended:
 - English: “The Food Stamp Program provides nutrition assistance to people with low income. It can help you buy nutritious foods for a better diet. To find out more, contact [enter your local office or toll-free number, or other useful information to help identify how to get services].”
 - Spanish: “El Programa de Cupones para Alimentos ofrece asistencia relacionada a la nutrición para gente con bajos ingresos. Le puede ayudar a comprar comida nutritiva para una mejor dieta. Para obtener más información, comuníquese con la oficina de servicios sociales de su condado.”

Section C. Staffing

We recommend the use of Template 4 in Appendix A to provide the information requested on costs associated with the employment of staff for FSNE. Please note that all staff paid with FSNE funds must support the delivery of FSNE to FSP eligibles. For each project, provide the following information for **all** paid staff that will carry out FSNE functions. Volunteer time should not be included in this section, but should be included as part of budget narrative describing in-kind donations (see Appendix C, Section A.4 for additional information on in-kind donations).

1. Position title (e.g., Nutrition Educator, Project Coordinator, etc.).
2. For each position title, attach a statement of work/position description outlining the duties associated with the FSNE project. This must clearly show how the position supports the delivery of planned FSNE activities.
3. For each position title, provide the Full Time Equivalents (FTEs) that will be funded through FSNE. FTEs are defined in Appendix D: Definitions. States may use their own definition of FTEs for purposes of reporting FSNE staffing requirements in this section, but must provide their definition with an explanation of how FTEs are calculated.
4. For each position title, provide the percentage of FSNE time the position will spend performing management/administrative duties (including training and professional development) and the percentage of time that the position will spend on direct delivery of FSNE. This information should coincide with information provided in the attached statement of work/position description.
5. For each position title, provide the total salary, benefits and wages, and specify the amount of the total to be funded with Federal dollars and State/other dollars (estimate may be used for budget, but actual time spent must be used for billings).

Section D. Budget Summary

We recommend the use of Template 5 in Appendix A for the submission of this information.

1. Contracts, Grants or Agreements for Nutrition Education Services

If the State agency intends to contract for FSNE with sub-grantees, list each sub-grantee that is a recipient of Federal grants, cooperative agreements or contracts related to FSNE. Include the following for each sub-grantee:

- a. Name of sub-grantee or contractor
 - b. Federal funding requested
 - c. State and other non-Federal funding provided and source in terms of cash and in-kind sources
 - d. Description of services
 - e. Cost of services
2. Attach a copy of any interagency agreement(s) that identifies how Federal funds will be shared between the State or county agency and/or other agencies. Submit a list of all sub-grantees and amount of funding for each grant, noting both Federal funding and funding from non-Federal sources including cash and value of in-kind services. For each sub-grantee, provide the State and Federal cost for each planned nutrition education project. Provide a detailed breakdown that includes at a minimum the information contained in Appendix A, Template 5.
 3. Travel
Travel requests must be identified for both in-state and out-of-state purposes. States must justify the purpose of the travel, describe how the travel request supports the State's FSNE goals and objectives, and demonstrate how they will disseminate the information obtained to both, in-state educators and collaborators and in-state food stamp office staff. **Refer to Appendix C, Section A.16 for information on what travel-related costs are allowable.** Provide the following information for travel **included in your FSNE budget:**
 - a. Travel destination
 - b. Purpose and justification for travel
 - c. Number of staff traveling
 - d. Cost of travel

Section E. Assurances (Appendix A, Template 6)

To assure compliance with policies described in this guidance, the FSNE plan must include the following assurances that:

1. The State food stamp agency is accountable for the content of the State nutrition education plan and provides oversight of any sub-grantees. The State food stamp agency is fiscally responsible for nutrition education activities funded with FSP funds and is liable for repayment of unallowable costs.
2. Nutrition education activities are conducted exclusively for the benefit of **those eligible for the FSP.**
3. **In cases where FSNE projects may inadvertently benefit persons that are ineligible for the FSP because it is not practical or possible to meet the exclusivity requirement, the State has submitted waiver requests for each project. The waiver request(s) clearly demonstrate how the proposed project provides a good means of reaching food stamp eligibles and documents**

that at least 50 percent of those reached will have gross incomes at or below 185 percent of the poverty thresholds or guidelines.

4. Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) may be claimed under the FSNE grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional food stamp eligibles or to provide additional education services to EFNEP clients who are eligible for the FSP. In no case may activities funded under the EFNEP grant be included in the budget for FSNE.
5. Cash or in-kind donations from other non-Federal sources to FSNE have not been claimed or used as a match or reimbursement under any other Federal program.
6. Costs incurred by other State and/or local agencies for goods and services for FSNE and which are then donated to the food stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not be used as a match under any other Federally funded project.
7. Documentation of State costs, payments, and donations for approved FSNE activities are maintained by the State and will be available for United States Department of Agriculture review and audit.
8. Contracts are procured through competitive bid procedures governed by State procurement regulations.
9. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB circulars governing cost issues.
10. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.
11. Program activities are reasonable and necessary to accomplish FSNE objectives and goals.
12. All materials developed or printed with FSNE funds include the appropriate USDA non-discrimination statement, credit to the FSP as a funding source, and a brief message about how the FSP can help provide a healthy diet and how to apply for benefits.
13. Messages of nutrition education are consistent with the Dietary Guidelines for Americans and stress the importance of variety, balance, and moderation, and do not disparage any specific food, beverage, or commodity.

Section F. Waiver Requests

(Appendix A, Template 7)

Under the provisions of 7 CFR 272.3(c), FNS has the authority to approve requests from State agencies for waivers of regulatory requirements, provided the waivers are not inconsistent with the provisions of the Food Stamp Act and do not adversely affect participants or applicants. In addition, States must show how a waiver will improve the efficiency and effectiveness of the FSP, and concomitantly, would not increase Federal costs. The two waivers relevant to the administration of FSNE are noted below with additional detail and instructions pertaining to FSNE-related waiver requests provided in Appendix C, Section A.3 and a general template provided in Appendix A. States that are not requesting any waivers, may skip this section.

When persons that are ineligible for the FSP may inadvertently benefit from FSNE projects because such persons cannot be separated out from those eligible for the Program, States must submit exclusivity waivers for each project (7 CFR 272.3). See Appendix C, section A.3 for information on waiver requests, exceptions to the exclusivity waiver requirement, and details on the justification

and documentation required. Template 7 provides the general waiver request outline. As described in further detail in Appendix C and Template 7, waiver requests must:

- Be completed on a “project” basis, meaning that they are requested for a defined geographical area.
- Describe in detail the procedures the State agency plans to follow in lieu of the regulatory requirement.
- Justify why it is not possible to provide FSNE exclusively to FSP eligibles without inadvertently reaching other audiences.
- Show how the project provides an efficient and effective means of reaching FSP eligibles.
- Anticipate the impact on FSP eligibles in terms of quality of services, any administrative or Program savings, and any adverse effects on FSP eligibles or the State agency if the waiver is not granted.
- Provide documented demographics to demonstrate that at least 50 percent of the population that will benefit from the FSNE activity has an income that is at or below 185% of the poverty guidelines/thresholds.
- Be signed and dated by the requesting official.

Federal regulations prohibit the consideration of private cash donations as part of a State’s expenditures for which FNS will reimburse 50 percent [7 CFR 277.4 (c) & (d)]. However, a waiver is permissible, when certain assurances are provided. See Appendix C, section A.3 for information on private cash donation waivers.

Section G. Signatures **(Appendix A, Template 8)**

The nutrition education plan must be signed by both the State agency Nutrition Coordinator (or alternatively, the State FSP Director) and a State agency Fiscal Reviewer prior to submission.

Appendix A:
Optional Report and Plan Templates

Appendix A. Template 1: State Nutrition Education Report Summary

Section A. State Nutrition Education Report Summary-provide the following descriptive data for each project and social marketing campaign that took place during **FY 2005**. See page 15 for instructions.

State Summary of Projects. A project is a discrete unit of nutrition education intervention at the local level.								
	Title	Location		Audience	Delivery Method	Content		Evaluation Type
	Project Name	Geographic Location (Statewide or Counties Reached)	Type and Number of Delivery Sites	Note if this project was delivered to a specific segment of FSP eligibles	Primary method(s) used (e.g., one-on-one or group/classes)	Primary Core Element Covered	Key Message(s)	Indicate formative, process, impact or none.
Example	FSNE Parent Project	Fairfax Co, Prince William Co,	15 Schools	Mothers of elementary school children	6 30-minute group classes, 6 mailed newsletters	Dietary Quality	Be a role model: Eat breakfast with kids.	process
1.								
2.								
3.								

Appendix A. Template 1: State Nutrition Education Report Summary (continued)

State Summary of <u>Projects</u> (Continued). A project is a discrete unit of nutrition education intervention at the local level.								
	Title	Location		Audience	Delivery Method	Content		Evaluation Type
	Project Name	Geographic Location (Statewide or Counties Reached)	Type and Number of Delivery Sites	Note if this project was delivered to a specific segment of FSP eligibles	Primary methods used (e.g., one-on-one or group/classes)	Primary Core Element Covered	Key Message(s)	Indicate formative, process, impact or none.
4.								
5.								
6.								
7.								

Appendix A. Template 1: State Nutrition Education Report Summary (continued)

State Summary of Social Marketing Campaigns.

A social marketing campaign is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior. Although social marketing efforts often make use of television, radio ads, videos, and brochures, these materials by themselves do not constitute social marketing. Rather, social marketing entails a comprehensive program in which these materials are employed as part of multiple tactics to reach a target audience.

Title	Location		Audience	Method	Content		Evaluation
Name of Campaign	Geographic Location (statewide or counties reached)	Length of Campaign (in months)	Note if this campaign was delivered to a specific segment of the FSP population	Primary Activities (radio PSAs, bus wraps, point of sale advertising, etc)	Primary Core Element(s) Covered (Dietary Quality, Resource Management, Food Security, or Food Safety)	Key Message(s)	Evaluation Type (formative, process or impact)
(Example) FSNE Fruit and Vegetable Campaign	Philadelphia	3	Adult Women	Transit ads, radio PSAs, local newspaper inserts, posters	Dietary Quality	Eat more fruits and vegetables.	formative
1.							
2.							

Appendix A. Template 2: Final Report Contact Summary Data

Section B: Contact Summary Data

Provide contacts with audiences reached through FY **2005** Food Stamp Nutrition Education by project as well as State totals below. You may report contacts with persons or households; however, reporting the number of contacts with persons is preferred. **See page 16 for further instructions.**

Direct Contacts with Persons

Record the number of face-to-face contacts made through one-on-one counseling and group/classroom education. Please report the number of contacts made with people (FSP participants and non-participants) **NOT** the actual number of people. Example: If 100 FSP participants each attend 5 FSNE classes, record 500 contacts with FSP participants.

Project Name	FSP participant contacts (if available)	Non-FSP participant contacts (if available)	Total contacts (Non-FSP + FSP participants) with persons
(Example) FSNE Classes	500	0	500
1.			
2.			
3.			
4.			
5.			
6.			
Total Contacts			

Direct Contacts with Households

Record the number of face-to-face contacts made through one-on-one counseling and group/classroom education. Please report the number of contacts made with households (FSP and non-FSP) **NOT** the actual number of households. Example: If 100 households each received 5 lessons, record 500 contacts.

Project Name	FSP household contacts (if available)	Non-FSP household contacts (if available)	Total contacts (Non-FSP + FSP participants) with households
(Example) FSNE Lessons	500	0	500
1.			
2.			
3.			
4.			
5.			
6.			
Total Contacts			

Appendix A. Template 2: Final Report Contact Summary Data (continued)

Indirect Contacts with Persons

Report contacts made through the delivery of nutrition education to a person through an indirect or generalized strategy, such as health fairs, waiting room brochures, distance education, newsletters and social marketing campaigns. Please report the number of contacts made with people (FSP participants and non-participants) NOT the actual number of people. Example: If 250 FSP participants each receive four FSNE newsletters, report 1,000 FSP participant contacts. If you made 400 additional contacts with other low-income persons via this newsletter, record a total of 1,400 contacts.

Project Name	FSP participant contacts (if available)	Non-FSP participant contacts (if available)	Total contacts (Non-FSP + FSP participants) with persons
Example: FSNE Newsletter	1,000	400	1,400
1.			
2.			
3.			
4.			
5.			
6.			
TOTAL Contacts			

Indirect Contacts with Households

Contacts made through the delivery of nutrition education through an indirect or generalized strategy, such as health fairs, waiting room brochures, distance education, newsletters and social marketing campaigns. Please report the number of contacts made with households (FSP and non-FSP) NOT the actual number of households.

Project Name	FSP household contacts (if available)	Non-FSP household contacts (if available)	Total contacts (Non-FSP + FSP participants) with households
1.			
2.			
3.			
4.			
5.			
6.			
TOTAL Contacts			

Appendix A. Template 3: 2006 Nutrition Education Plan Proposed Projects

Section A. Identifying and Understanding the Target Audience

Refer to pages 16-20 for instructions.

1. NEEDS ASSESSMENT METHODOLOGY & FINDINGS

Needs Assessment Methodology

Describe and justify your methodology for assessing the needs of Food Stamp Program eligibles in your State.

Needs Assessment Findings

a. **Demographic Characteristics of Food Stamp Program Eligibles in [Your State]**

If information is available, discuss geographic location, race/ethnicity, age, gender, family composition, education, and primary language.

Appendix A. Template 3: 2006 Nutrition Education Plan Proposed Projects (continued)

b. Nutrition-Related Behavioral And Lifestyle Characteristics Of Food Stamp Program Eligibles In [Your State]

If information is available, discuss implications of dietary and food purchasing habits and where and how food stamp eligibles eat, redeem food stamp benefits, live, learn work and play in your State.

c. Other Nutrition-Related Programs Serving Low-Income Persons In [Your State]

Discuss the availability of other nutrition-related programs, services, and social marketing campaigns (i.e., EFNEP, Child Nutrition services, etc).

d. Areas Of [Your State] Where Food Stamp Program Eligibles Are Underserved Or Have Not Had Access To FSNE Previously.

Appendix A. Template 3: 2006 Nutrition Education Plan Proposed Projects (continued)

2. NEEDS ASSESSMENT APPLICATION

Based on your needs assessment and the current availability of other nutrition education services, describe and justify how you will reach Food Stamp Program eligibles and what priority areas your State will address through Food Stamp Nutrition Education.. Note that all areas and strategies used to address identified issues must fall within the scope and focus of Food Stamp Nutrition Education. Indicate which issues you addressed in fiscal year 2005 and which ones you plan to address in fiscal year 2006.

Appendix A. Template 3: 2006 Nutrition Education Plan Proposed Projects (continued)

Section B: 2006 State FSNE Goals, Objectives, Strategies and Collaboration

Refer to pages 20-25 for instructions.

1. GOALS & OBJECTIVES

Identify State nutrition education goals and measurable objectives related to the priority areas you identified in Section A.

2. STRATEGIES USED TO ACHIEVE ABOVE OBJECTIVES

a. Description of Nutrition Education Methods and Strategies

Discuss plans for reaching the target population. Identify local level interventions as well as State-based interventions. Specify how you will implement the project, giving particular attention to: how and where it will be delivered, its duration, the projected number of contacts with FSP eligibles and the frequency of contacts (number of classes, mailings, billboards, etc.), key educational messages, core elements covered and any segmentation of the target audience. Describe any social marketing strategies for the development and dissemination of educational interventions.

b. Summary of Research Supporting Selected Strategy

Briefly summarize existing research supporting the effectiveness and feasibility of your proposed nutrition education methods. Provide justification for adapting or changing an identified intervention method or strategy.

Appendix A. Template 3: 2006 Nutrition Education Plan Proposed Projects (continued)

3. USE OF EXISTING EDUCATIONAL MATERIALS

*Identify existing educational materials that you plan to use in the delivery of the intervention/program.
Note if they are in languages other than English.*

4. NEW EDUCATIONAL MATERIALS

Identify any new materials that you plan to produce and justify their need.

Appendix A. Template 3: 2006 Nutrition Education Plan Proposed Projects (continued)

5. PERFORMANCE MEASURES/OUTCOME INDICATORS

For each objective, provide the performance measures or indicators of expected outcome, for example, change in behavior (ate one additional vegetable per day) or improvement in cooking skills (learned how to properly cook dry beans or peas).

6. EVALUATION PLANS

For each objective, describe your evaluation plans (formative, process or outcome).

Appendix A. Template 3: 2006 Nutrition Education Plan Proposed Projects (continued)

7. COORDINATION EFFORTS

Describe efforts to coordinate, complement and supplement other programs in order to deliver consistent behavior-focused nutrition messages.

a. Other FNS Programs

b. [Your State] State Nutrition Action Plan (SNAP)

c. Department of Education and School Administration (for school projects)

d. Other

Appendix A. Template 4: Nutrition Education Plan Staffing

Section C. Staffing

See page 24 for detailed instructions on completing this template. Provide the following summary by Food Stamp Nutrition Education (FSNE) project for all paid staff in the FY 2006 budget. Provide the Full Time Equivalents (FTE), describe staff responsibilities as they relate to FSNE and note the funding amounts that will be paid by State and/or Federal funds.

Project Name:						
1.Position Title*	2. FTEs charged to FSNE	3. Description of Job Duties		4. Total FSNE Salary, Benefits and Wages		
*Attach statement of work listing FSNE-related job duties for each position.	*Attach definition of FTE and basis for calculations.	Percentage of FSNE Time spent on Management/Administrative Duties	Percentage of FSNE Time spent on Direct FSNE Delivery	State/Other Dollars	Federal Dollars	Total (State/other + Federal) Dollars
Totals						

Appendix A. Template 5: 2006 Nutrition Education Plan Budget Summary

Section D. Budget Summary

See pages 24-25 for additional instructions on completing this template. Refer to Appendix C for additional information on allowable costs.

1. CONTRACT/GRANTS/AGREEMENTS FOR NUTRITION EDUCATION SERVICES

Fill this information in for each contract, grant, or agreement.

- a) Name of sub grantee or contractor
- b) Federal funding requested
- c) State and other non-federal funding amount and source (allowable non-federal share). Include case and in-kind sources.
- d) Description of services
- e) Cost of services

Note: Total amount for all contract/grants to be entered as line 2 of budget summary table on this template.

2. BUDGET INFORMATION BY PROJECT

Attach interagency agreements and a list of sub-grantees. For each sub-grantee, provide the State and Federal cost for each planned nutrition project. Provide a detailed breakdown that includes, at a minimum, the information contained on the following table.

Appendix A. Template 5: 2006 Nutrition Education Plan Budget Summary (continued)

2. BUDGET INFORMATION BY PROJECT (CONTINUED)

Project Name:						
Expenses	(a) State/Local Funds		(b) Other Non-Fed. Funds		(c) Total Non Federal Funds (a+b)	(d) Federal Funds
	Cash	In-kind	Cash	In-kind		
1. Salary/Benefits						
2. Contracts/Grants/Agreements*						
3. Non-Capital Equipment/Supplies						
4. Materials						
5. Travel**						
6. Administrative						
7. Building/Space						
8. Maintenance						
9. Equipment & Other Capital Expenditures						
10. Indirect Cost***						
11. Totals						
12. Total estimated outlays/costs (State, local, non-Federal, Federal)						

*Attach Copies of interagency agreements to support line 2.

** Provide narrative describing travel costs on pages following this table.

***Provide assurance that the indirect cost rate is an approved rate (See Appendix C, Section A.2).

Appendix A. Template 5: 2006 Nutrition Education Plan Budget Summary (continued)

3. TRAVEL

Travel expenditures are a variable cost. In order to be considered for funding, the request must provide a direct and clear link to providing quality nutrition education for food stamp eligibles. Provide the following information for all travel included in your FSNE budget:

- a) **Travel destination**
- b) **Travel purpose and justification**
- c) **Number of staff traveling**
- d) **Cost of travel**

Note: Travel to be entered as line 5 of budget summary (Template 5).

Appendix A. Template 6: 2006 Nutrition Education Plan Assurances

Section F.

To assure compliance with policies described in this guidance, the Food Stamp Nutrition Education plan must include the following assurances. Mark your response to the right.

	YES	NO
1. The State food stamp agency is accountable for the content of the State nutrition education plan and provides oversight to any sub-grantees. The State food stamp agency is fiscally responsible for nutrition education activities funded with Food Stamp Program funds and is liable for repayment of unallowable costs.		
2. Nutrition education activities are conducted exclusively for the benefit of those eligible for the Food Stamp Program.		
3. In cases where Food Stamp Nutrition Education projects may inadvertently benefit persons that are ineligible for the Food Stamp Program because it is not practical or possible to meet the exclusivity requirement, the State has submitted waiver requests for each project. The waiver request(s) clearly demonstrates how the proposed project provides a good means of reaching food stamp eligibles and documents that at least 50 percent of those reached will have gross incomes at or below 185 percent of the poverty thresholds or guidelines.		
4. Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) may be claimed under the FSNE grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional food stamp eligibles or to provide additional education services to EFNEP clients who are eligible for the Food Stamp Program. In no case may activities funded under the EFNEP grant be included in the budget for FSNE.		
5. Cash or in-kind donations from other non-Federal sources to Food Stamp Nutrition Education have not been claimed or used as a match or reimbursement under any other Federal program.		
6. Costs incurred by other State and/or local agencies for goods and services for Food Stamp Nutrition Education and which are then donated to the food stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not be used as a match under any other Federally funded project.		
7. Documentation of State costs, payments, and donations for approved Food Stamp Nutrition Education activities are maintained by the State and will be available for USDA review and audit.		
8. Contacts are procured through competitive bid procedures governed by State procurement regulations.		
9. Program activities are conducted in compliance with all applicable Federal laws, rules, regulations including Civil Rights and OMB circulars governing cost issues.		

To assure compliance with policies described in this guidance, the Food Stamp Nutrition Education plan must include the following assurances. Mark your response to the right.

	YES	NO
10. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.		
11. Program activities are reasonable and necessary to accomplish Food Stamp Nutrition Education objectives and goals.		
12. All materials developed or printed with Food Stamp Nutrition Education funds include the appropriate USDA non-discrimination statement, credit to the Food Stamp Program as a funding source, and a brief message about how the Food Stamp Program can help provide a healthy diet and how to apply for benefits.		
13. Messages of nutrition education are consistent with the Dietary Guidelines for Americans and stress the importance of variety, balance, and moderation, and do not disparage any specific food, beverage or commodity.		

Appendix A: Template 7: 2006 Waiver Request Outline

Refer to pages 26-27 for additional instructions regarding waiver requests.

1. Waiver serial number:

Enter the waiver number if one was assigned in previous correspondence. The waiver serial number should be used in all correspondence regarding the waiver.

2. Type of request:

Enter “initial” if the State agency is requesting the waiver for the first time or “extension” if the waiver has been approved previously. Enter “modification” if the State agency is requesting a change to a previously approved waiver. Enter “reconsideration” if the State agency is requesting that the denial of a previous request be reexamined.

3. Primary regulation citation:

Identify the specific section of 7 CFR for which the waiver is requested. Contact the regional office if there is any question regarding the citation.

For exclusivity waivers the citation is: 7 CFR 272.2(d)(2)(iii).

For cash donation waivers the primary citation is: 7 CFR 277.4(c)

4. Secondary regulation citation:

Some proposals may require a cross-reference to another section of the regulations.

For example, a waiver to count income in the month it is intended to cover, rather than the month of receipt, may relate to both 7 CFR 273.10 and 7 CFR 273.21.

However, if the proposal requires waivers of two unrelated regulatory provisions (for example, to extend certification periods and also substitute a telephone interview for a face-to-face interview), two separate waiver requests and two primary regulation citations are needed.

There is no secondary citation for exclusivity waivers.

The secondary citation for private cash donation waivers is: 7 CFR 277.4(d).

5. State:

6. Region:

7. Regulatory requirements:

Describe the requirement that is to be waived. For example, 7 CFR 273.21(c) requires the State agency to have a toll-free number or accept collect calls.

8. Proposed alternative procedures:

Describe in detail the procedures the State agency plans to follow in lieu of the regulatory requirement. For exclusivity waivers describe how Food Stamp Nutrition Education will be delivered to FSP eligibles in a way that may also inadvertently benefit persons that are ineligible for the FSP. Provide the location of the project (e.g., school, food bank, public housing) and describe the audience that will receive FSNE. Indicate the projected number of people the intervention will reach, estimated number of total contacts and the number or percentage of total contacts that will be with FSP eligibles. The request must also indicate how the project will offer an educational message about the FSP, its benefits, and how to apply.

Appendix A: Template 7: 2006 Waiver Request Outline (continued)

9. Justification for request:

Explain the purpose of the waiver and how it meets the approval criteria of the regulations. For exclusivity waivers, States must document that:

- *It is not possible to provide FSNE exclusively to FSP eligibles without inadvertently reaching other audiences because it is not possible or practical to identify FSP eligibility or to specifically provide FSP eligibles with nutrition education without reaching others.*
- *The project provides an efficient and effective means of reaching FSP eligibles.*
- *At least 50 percent of the population that will receive FSNE has gross household incomes that are at or below 185 percent of the poverty guidelines or thresholds. Reference data sources.*

10. Anticipated impact on households and State agency operations:

Describe the effect the waiver is expected to have on households in terms of quality or timeliness of service, any administrative or Program savings, and any adverse effect on households or the State agency if the waiver is not granted.

11. Caseload information, including percent, characteristics, and quality control error rate for affected portion:

Provide detailed information regarding the percent of the total caseload which would be affected by the waiver, whether the households are prospectively or retrospectively budgeted, monthly reporters or change reporters, elderly or disabled, and other relevant information. Provide the latest quality control information available for the type of household affected. For example: "Pure SSI households constitute 15 percent of the caseload and have an error rate of 7 percent."

12. Anticipated implementation date and time period for which waiver is needed:

Indicate the State agency's time frame for putting the waiver into effect and the period for which the waiver is requested.

13. Proposed quality control review procedures:

Describe the effect the waiver is expected to have on quality control review procedures. If applicable, provide detailed review procedures to be used in lieu of procedures in the FNS Handbook 310.

14. Signature and title of requesting official:

Type the requesting official's name and title and leave sufficient space for the stamped signature. The date will be date-stamped on line 15.

15. Date of request:

Date stamp with the date the request is signed.

Appendix A. Template 8: 2006 Nutrition Education Plan Signatures

Section G: Signatures

FOOD STAMP PROGRAM

Fiscal Year 2006

Annual Plan For Nutrition Education

for

STATE AGENCY: _____

FISCAL YEAR: ____ _

DATE: _____

Certified By:

STATE AGENCY NUTRITION COORDINATOR
or STATE FOOD STAMP DIRECTOR

DATE

Certified By:

STATE AGENCY FISCAL REVIEWER

DATE

Appendix A. Template 9: Sample Time and Effort Documentation

Refer to Appendix C, Section A.10 for instructions on time and effort documentation.

Time and Effort Documentation for hours worked specifically on Food Stamp Nutrition Education

Name _____ Location _____ Title/Position _____

Month:	
Day	Hours Worked
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	
31	

Month's Total:

Month:	
Day	Hours Worked
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	
31	

Month's Total:

Month:	
Day	Hours Worked
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
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21	
22	
23	
24	
25	
26	
27	
28	
29	
30	
31	

Month's Total:

Quarter Total:

Employee signature & date: _____

Supervisor signature & date: _____

Adapted from Wyoming form, May 2003.

Appendix B:

Reporting and Record Retention Requirements

Form 366A-State Agency

In addition to submitting the nutrition education plan, State agencies must submit FNS-366A, Budget Projection Statement, for FNS approval. State agencies must report their projected requested Federal funding for nutrition education on FNS Form FNS 366A, line 17, Nutrition Education. This report is due August 15th in the FNS Regional office for the upcoming Federal FY.

Form SF-269-State Agency

The State agency must report nutrition education expenditures, in Column 17-Nutrition Education- on FNS Form SF-269. This report is to be submitted quarterly, 30 days after the end of each quarter. A final report is due 90 days following the end of the Federal fiscal year.

Record Retention and Management-State Agency and All Sub-grantees

FSP regulations require that all records be retained for three years from fiscal closure. This requirement applies to fiscal records, reports and client information. Supporting documentation may be kept at the sub-grantee level, but must be available for review for three years from the date of quarterly claim submittal. Any costs that cannot be substantiated by source documents will be disallowed as charges to the FSP.

Appendix C:

Cost Policy

The following discusses the costs that can be approved for Federal reimbursement under an approved FSNE Plan.

Food Stamp Program Reimbursement Structure

Under Section 16 of the Food Stamp Act of 1977, as amended, a State food stamp agency is reimbursed 50 percent for allowable administrative program costs that are reasonable and necessary to operate approved nutrition education activities. Because State costs, by law, are reimbursed, FSNE is not a “grant” program, which provides a set level of funding for specific activities for a specific period of time, nor is it technically a match program. It reimburses 50 percent of States’ allowable expenditures. Nevertheless, the term “grantee” is used in this guidance to denote the State agency, and the term “sub grantee” is used to denote those entities that are under agreement with the State agency to provide services. Despite the use of this nomenclature, it is important to understand that the food stamp program operates as a reimbursable agreement. Federal funds reimburse States for only half of all allowable costs.

If State agencies determine that actual total expenditure for State FSNE activities will exceed planned expenditure by 5% or by greater than or equal to \$100,000, whichever is less, advance Federal approval is required to ensure that these additional costs are reasonable and necessary (see State Plan Amendments page 53).

While plan activities are approved on an annual basis, allowable costs may be reimbursed in the subsequent year if the activity overlaps fiscal years or if payment for services delivered during the fiscal year was delayed. Nutrition education project obligations must be established in the fiscal year the funds are appropriated but disbursements against these obligations may occur after the fiscal year closes. Federal reimbursement is subject to the availability of Federal funds. State agencies have a two year deadline to claim prior year costs. Expenditures must be submitted within two years after the calendar quarter in which the State (or local) agency incurred the cost.

Allowable Costs

Allowable costs are specified under OMB Circulars A-87, A-21, A-110 and A-122, Departmental rules at 7 CFR 3016 and FSP rules at 7 CFR Part 277. To be allowable, all costs charged to FNS must be valid obligations of the State, local government or sub-grantee and must be necessary and reasonable as charges under an approved FSNE plan.

State Plan Amendments

If State agencies determine that actual total expenditure for State FSNE activities will exceed planned expenditure by 5% or by greater than or equal to \$100,000, whichever is less, advance Federal approval is required to ensure that these additional costs are reasonable and necessary. In these instances, a State must submit a plan amendment for Federal approval prior to incurring the expenses to ensure that costs are allowable, reasonable and necessary. Further, if the scope of the activities in a plan changes, regardless of the impact on the planned expenditures, a State must submit a plan amendment for FNS approval. See instructions regarding plan amendments on page 12.

A. Allowable and Unallowable Administrative Expenses

Allowable administrative costs are operational costs for FSNE, which include all administrative expenses that are reasonable and necessary to operate approved nutrition education activities. Allowable administrative expenses include:

- salaries and benefits of personnel involved in FSNE and administrative support;
- office equipment, supplies, postage, duplication costs and travel that is necessary to carry out the project's objectives;
- development and production of FSNE materials when no other appropriate materials exist (see pages 21-23);
- lease or rental costs;
- maintenance expenses;
- other indirect costs;
- and charges for travel for the purpose of fulfilling the approved plan based on official State, local or university travel regulations.

Unallowable administrative expenses- Listed below are unallowable costs per A-87 and A-21 for State and local governments: (Similar lists are found in A-110 and A-122, the Circulars applicable universities and non-profit organizations).

- Bad Debts-uncollected accounts or claims, and related costs.
- Contingencies-contributions to an emergency reserve or similar provision for unforeseen events. (these are not insurance payments which are allowable).
- Contributions and Donations (usually these are political in nature).
- Entertainment-costs that are primarily for amusement or social activities. (This is actually one with a lot of exceptions. Meals for example are cited in the Circular, but within the context of training, meals might be allowable. There are a number of costs here that require a "reasonable judgment" based on why or when the activity takes place).
- Fines and Penalties-violations or penalties for failure to comply with Federal, State, or Local laws.
- Governor's Office-specifically costs of general government. Costs which may be directly charged to a Federal grant may be allowable. (For example, if a person assigned to the governor's office devotes 100 percent of his/her time to the FSP, the cost may be allowable. Each situation, however, must be judged on its own merit).

- Indemnification-payments to third parties and other losses not covered by insurance.
- Legislative Expenses.
- Losses Not Covered by Insurance (see Indemnification above. These costs are similar, but not the same).
- Under Recovery of Costs under Federal Funding Agreements-shortfalls in one grant cannot be charged to another Federal grant. (This is not the same as charging two Federal grants for a share of the costs of the activity if both agencies benefit from the activity funded. However, an allocations basis must be established for sharing the costs in proportion to the benefit each receives.)
- Alcoholic Beverages.

For A-21 there are some *unallowable cost* categories in addition to those listed above:

- Advertising and Public Relations- Unless used for recruitment of staff, acquisition of material for the grant, or publishing the results of the grant.
- Alumni Activities.
- Commencement and Convocations.
- Legal Fees Which Result From a Failure to Follow Federal, State or Local Laws. If certain conditions are met, the Federal government may allow some legal fees.
- Executive Lobbying.
- Goods and Services for Private Use.
- Housing and Personal Living Expenses.
- Interest, Fund Raising, and Investment Management- (For interest, there are exceptions. But if the cost is shown it needs to be examined in light of the exceptions.)
- Any and All Political Party Expenses.
- Pre-agreement Costs- All costs incurred prior to the grant award.
- Scholarships and Student Aid-(There are exceptions which should be reviewed if these costs appear in budget.)
- Student Activity Costs.
- Travel-Allowable but with restrictions as to amounts involved, level of transportation costs (e.g., no first class tickets).

Reasonable and necessary costs

While the OMB circulars spell out what is allowable, costs that may be covered by the FSP for nutrition education must also meet a “reasonable and necessary” test.

Reasonable Costs

- Provide a program benefit generally commensurate with the costs incurred,
- Are in proportion to other program costs for the function that the costs serve,
- Are a priority expenditure relative to other demands on availability of administrative resources, and
- Carry constructive nutrition education messages consistent with the Dietary Guidelines for Americans.

Necessary Costs

- Are incurred to carry out essential functions,
- Cannot be avoided without adversely affecting program operations, and
- Do not duplicate existing efforts

Note: Remarks in parentheses represent clarification by the Food and Nutrition Service and are not Circular language.

A.1 Property Procurement and Management

The State agency and all sub-grantees must follow procurement requirements found in 7 CFR 3016.

The State agency must receive prior Federal approval before procuring or requesting reimbursement for equipment valued at more than \$5,000 per item. Review and approval of equipment acquisition is normally conducted during review of the proposed budget. Budget review should ensure that proposed equipment requests do not duplicate previous year's equipment purchases for the same project. Inventory records must be maintained for equipment that is paid for in full, or in part, with Federal funds. A physical inventory is required every two years.

A.2 Indirect Cost Rate

Indirect cost computation is based on policy prescribed by the OMB. The intent of the OMB policy is to ensure that the Federal government bears its fair share of costs in accordance with generally accepted accounting principles.

Indirect costs are defined as those that benefit more than one program but are not easily identified to a specific program. The general rule is that if a cost can be readily attributed to a specific program it should be classified as a direct cost rather than be included in the indirect cost pool.

One basic computation method is to 1) identify all the costs that are considered indirect costs because they serve several programs (e.g., payroll, computer center, and personnel), 2) total indirect costs, 3) identify all the programs that are served by indirect costs 4), total the direct costs of all the programs served. Divide total indirect costs by total direct costs, which results in an "Indirect Cost Rate." This rate is then applied to the direct costs of each program (in this case nutrition education) and the result is charged to the program as its "indirect cost."

Indirect Cost Plans and Applicable Rates- The use of indirect cost plans by colleges and universities is allowable. However, unless justification is provided, only the off-campus rates may be used. In addition, if additional categories, such as "other sponsored activities", are covered, the instructional rates can not be used without justification. In most plans only one rate may be used for each program charged. As a result, any justification for using either the on-campus or off-campus rate must be based on where the majority of the allowable activities take place. In this case the allowable activities are defined as those activities that provide nutrition education to the recipient population. Other activities, such as research and data analysis, while allowable, are not understood to be the primary purpose

of FSNE, and therefore are not to be used in determining where the majority of the activities take place. Indirect costs at colleges and universities are limited to 26% of total modified direct costs, based on OMB Circular A-21.

Small local agencies may not have staff with the expertise to develop indirect cost rates. They should, however, be able to go to their State agency for assistance or obtain contracted accounting services as an allowable program cost. Any costs of determining the indirect costs are themselves allowable costs that are included as either direct or indirect costs.

- If the State agency does not accept the responsibility for approving the indirect cost rate, or disapproves the rate, the FNS Regional Office will not accept the rate.
- The State agency must document its plan to indicate acceptance of the indirect cost rate.

State agencies are responsible for ensuring that indirect costs included as part of the State FSNE Plans are supported by an indirect cost agreement approved by the appropriate cognizant agency and are claimed in accordance with that agreement. FNS may request documentation in support of an indirect cost rate. See definitions in Appendix D for more information on “cognizant agency”. Local agencies which do not have a cognizant agency to review and approve their rates may apply, through the State agency, for approval to use a rate developed either by or for the local agency. The FNS Regional office may accept or reject use of the rate based on the rate computation documents.

A.3 Waivers

Exclusivity Clause Waivers. FSNE is exclusively for the benefit of individuals that are eligible for the FSP. The term “food stamp eligible” is defined in Appendix D and is discussed in detail on pages 16-18. This policy is consistent with language in the Food Stamp Act, as amended (7 USC 2011, Section 11 (f) (1)). State agencies must target their programs to FSP eligibles. However, they may pursue an “exclusivity waiver” on a project basis to allow certain projects that inadvertently reach other low-income individuals that are not eligible for the FSP. “Project” is defined in Appendix D as “a discrete unit of nutrition education intervention at the local level with a specifically identified low income target population”. General instructions for completing the waiver request are provided in Appendix A, Template 7. In addition, States requesting a waiver of the exclusivity regulation for FSNE activities must document, on a project basis, that:

- It is not possible to provide FSNE exclusively to FSP eligibles without inadvertently reaching other audiences because it is not possible or practical to identify FSP eligibility or to specifically provide FSP eligibles with nutrition education without reaching others (i.e., social marketing campaigns and media communication).
- The project provides an efficient and effective means of reaching FSP eligibles. The waiver must indicate the projected number of people the intervention will reach, estimated number of total contacts and the number or percentage of total contacts that will be with FSP eligibles.

- At least 50 percent of the population that will receive FSNE has gross household incomes that are at or below 185 percent of the poverty guidelines or thresholds. In developing data for waiver requests, the following data may be used to calculate the extent to which the population meets the income criteria:
 - a. FSP, FDPIR and TANF participation data;
 - b. census tract information;
 - c. other community program participation data;
 - d. school lunch free and reduced price data; and
 - e. WIC participation data.

Asking individuals for personal income data is not an appropriate means to determine whether the target audience is low income, and goes beyond the scope of data needed for waiver purposes. The Census Bureau provides information on the number of people living in poverty by state and region at <http://factfinder.census.gov>.

- The project will offer an educational message about the FSP, its benefits, and how to apply.

Documentation to show that each project meets these criteria must be submitted in one or more waiver requests. States may submit a separate waiver request for each project or they may submit a listing of local projects for which they are seeking waivers. Statewide waivers are not permissible. The waiver request must contain project-specific information and supporting documentation in sufficient detail to ascertain that each project is targeted to FSP eligibles. Each waiver request will be approved or denied separately, regardless of format, on the basis of supporting documentation.

Exceptions to Requirement for Exclusivity Clause Waivers

Table II (see page 18) provides examples showing when a waiver may or may not be needed.

1. Food Distribution Program on Indian Reservations (FDPIR). Because persons eligible for the FSP may participate in FDPIR in lieu of the FSP, FDPIR participants may be targeted for FSNE without waiver, and will be considered as if participating in the FSP.
2. Categorically Eligible Persons. Persons eligible for the FSP by virtue of their allowable categorical eligibility consistent with FSP regulations at 273.2(j) may be targeted for FSNE without waiver.
3. Persons with incomes less than or equal to 130% of the poverty guidelines. This income level may be considered a reasonable proxy for FSP eligibility in the case of FSNE participation in most cases. This proxy does not apply to persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students-see Appendix C).

Use of Private Cash Donation Waivers. Federal regulations prohibit the consideration of private cash donations as part of a State's expenditures for which FNS will reimburse 50

percent. [7 CFR 277.4 (c) & (d)]. However, a waiver is permissible with the following assurances:

1. no endorsements of donors or products will be given in connection with the nutrition education activities.
2. no funds will revert back to donor or benefit the donor.
3. funds are donated without restriction on use for a specific person, institution, or facility.
4. funds are to be under the State's administrative control.

Assurances that these conditions are met must be included in the State agency's waiver request and noted in the nutrition education plan. As State agencies seek private cash donations, they need to understand these constraints. State agencies may also accept private in-kind donations, but they may not claim their value for FSP reimbursement. No waivers are available to permit private in-kind donations to be considered as part of the State's expenditures for which FNS will reimburse 50 percent.

A.4 In-kind Donations Not Involving Transfers of Cash

1. In-kind donations that are the value of volunteer time or other non-billable goods or services (e.g., there is no cash transfer between parties) are not allowable as charges to this grant if they are provided **to or by a non-governmental agency or sub-grantee.**
2. In-kinds from government agencies cannot be charged to another Federal grant.
3. Goods and services requiring a transfer of cash are not in-kinds. However, goods and services that require a cash reimbursement by the sub-grantee may be charged as a cost, providing the cash reimbursement is based on a legally enforceable contract or agreement between the grantee and sub-grantee. An obligation to pay must exist for a sub-grantee to have a valid claim. FNS will then reimburse 50% of the outlay incurred by the grantee or sub-grantee.
4. **A grantee (the State agency) or sub-grantee cannot claim a donated service or a good as an in-kind if:**
 - a) It is not allowable, reasonable, or necessary for the delivery of FSNE;
 - b) Payments are made by the State agency or sub-grantee for any of the goods and services (payments are actual outlays rather than in-kinds); or
 - c) The sub-grantee claiming the in-kind is a private organization. As specified under 7 CFR 277.4(e), only public agencies are allowed to claim in-kind charges. Because the value of in-kind donations including volunteer services to a private entity (private schools, churches, non-governmental entities, etc.), do not represent any State expenditure or outlay, FSP regulations do not permit them to be considered as a cost to the program and thus are not reimbursable.
5. **A grantee or sub-grantee may claim a service or a good as an in-kind if:**
 - a) It is allowable, necessary, and reasonable for the delivery of FSNE.
 - b) The sub-grantee claiming the "in-kind" is a public organization as specified under 7

CFR 277.4(e). These regulations were written in the interests of maximizing States' ability to identify allowable matching sources. By extension of logic FNS has allowed for regulatory support to the concept that the donation of goods and services to a public entity result in a de facto State expenditure or outlay. Thus, they are reimbursable. (Note that regulations do not permit extending this interpretation to private organizations).

c) In valuing a volunteer's time or service to a public organization, the following principles apply:

- 1) The volunteer's wages are computed on a reasonable hourly basis in accordance with the duties being performed for FSNE, or wages are computed based on the Federal minimum hourly wage established by the United States Department of Labor;
- 2) The volunteer records time as specified in the FSNE Guidance (Appendix C, Section A.10, Time Records); and
- 3) The value of the volunteer's time is not being used as a match for any other Federal grant.

d) In valuing donated goods, the following principles apply:

- 1) The value for goods other than government-owned space is computed on reasonable fair market value;
- 2) When valuing space owned by a government agency, depreciation is used for cost computations; and
- 3) The value is not being used as a match for any other Federal grant.

A.5 Donations from Non-Federal Public Agencies

As specified under 7 CFR 277.4(c)(d)(e), Federal reimbursement for the costs of services or property donated by other non-Federal public (i.e., government) agencies is allowable provided that the donated costs are not billed or claimed to another Federal program or used to match another Federal program. The State agency must maintain records or an audit trail to support costs directly claimed or used as a match. The match must be for FSNE allowable activities.

A.6 Non-Federal Public Agencies

A non-Federal public agency is an organization of State or local government that is supported by funds derived from general tax revenues (receipts) of a State or locality specifically allocated from appropriate budgetary authority such as a State legislature, county or local government. This would include, for example, State or local government financed educational institutions and State funded hospitals. Funding from non-Federal public agencies serves as the foundation for calculating a State's total costs of FSNE, of which 50 percent is reimbursed with Federal funds.

The Department's Office of General Counsel (OGC) has reviewed whether the term "non-Federal public agencies", as used in 7 CFR 277.4(c), can be interpreted to include "marketing orders, councils and commissions". OGC concluded that marketing orders, councils, and commissions may be included within the term, "non-Federal public agency" for the purposes of using the donation as part of State cost for Federal matching funds depending on the source from which they derived the budgetary authority and the activity in which they are engaged. To be included as State cost, the budgetary authority must be

delegated through some act of the State legislature or by a branch of State government and the activities in which the entity engage must be governmental in nature. The activities must affect the right of private parties through adjudication, rule making, investigating, prosecuting, negotiating, settling, or informally acting. Membership assessments should be relatively equal among the various members.

The State agency must describe in the plan the source of the entity's regulatory authority and the nature of the activities in which the entity is engaged. The State agency must also describe the relationship of the entity to the objectives of the proposed nutrition education activity. Funding provided by the marketing order should be used to support objectives of the nutrition education activity benefiting the food stamp households. Marketing orders funding for FSNE should not be used to promote single-commodity nutrition education messages to the exclusion of the overall nutrition education objectives.

A.7 Medical Equipment & Clinical Health Assessments

FNS has determined, based on OMB Circular A-87 that medical equipment or health services related to health assessments of recipients, obtaining clinical data on nutritional status, chronic disease or chronic disease risk assessments are not a necessary and reasonable cost to provide nutrition education in the FSP. Therefore, they are not allowable costs. For example, measurement of height, weight, skinfold thickness, blood pressure, cholesterol, blood glucose and iron levels are not allowable costs. However, salaries and benefits of personnel to administer dietary intake data questionnaires on nutrition knowledge and behaviors are allowable costs.

A.8 Gardening

Gardening is a beneficial project that leads to the economical production and consumption of healthy and fresh food. The provisions of OMB Circular A-87 allow USDA/FNS to make a reasonable judgment as to what is necessary and reasonable to deliver nutrition education. The cost for the rental or purchase of garden equipment (fertilizer, tractors), the purchase or rental of land for garden plots, seeds, plants, and other gardening supplies are not allowable FSNE costs. Only educational supplies, curricula and staff salaries to teach gardening concepts that reinforce the beneficial nutrition aspects of gardening are allowable costs. (Note that participants may use program benefits (coupons/EBT) to purchase seeds and plants for gardening purposes).

A.9 Valuation of Publicly Owned Space

Charges For Publicly Owned Space-Space owned by public entity cannot be charged to a Federal grant based on private market rental rates. The entity can only recover the costs of space through a depreciation schedule or use allowance, applicable charges for utilities, maintenance, and general upkeep.

Federal requirements regarding the valuation of publicly owned space is contained in OMB Circulars A-87, 21, and A-110 and Departmental regulations at 7 CFR 3016 and indicate that in no case may publicly owned space be "donated" or billed at fair market rental rates. The only method allowable for calculating reimbursement of publicly owned space is depreciation or use allowance. Fair market rates may not be used for publicly owned space

regardless of whether they are direct billed or donated. The cost of space owned by a public agency is the acquisition cost of that space, plus maintenance and utilities. (FNS Policy Memorandum-March 9, 1998)

Example of Calculating Valuation of Publicly Owned Space-Only the depreciation or use allowance method may be used to charge FNS for use of publicly owned space. Depreciation is dividing the cost of the building over its useful life. For example, if a building cost \$50,000 to build and it had a useful life of 20 years, the yearly depreciation would be \$2500. This cost is spread over the square footage of the building, resulting in an annual rate per square foot. The FSP share would be the amount of space that is used for the FSP. A use allowance is used when the building is fully depreciated. You are allowed to charge no more than 2 percent of the cost of the building per year. In the example above, States could only charge \$1000 per year.

A.10 Time Records

Weekly time and effort reporting is required by FNS for staff paid through the nutrition education funds for Food Stamp **eligibles** and those contributing to this work through cost share. Additionally, records must be maintained for third party contracts of less than 100 percent time.

Time records are used to calculate the charges for time spent on allowable activities. The administrative office which converts hours worked into dollars charged must also maintain accounting records that substantiate the charges incurred. Costs charged based on time and effort reporting would include salaries and fringe benefits for staff employed. These costs must relate to the total accounting documentation maintained by the organization that is asserting the claim.

Staff Devoting 100 Percent of Time to FSNE

- A semi-annual time and effort certification by a supervisor is required.

Staff Devoting Less Than 100 Percent of Time to FSNE

- Time records are required for all nutrition education staff devoting less than 100 percent of their time to FSNE unless a Federally approved Random Moments Time Study is used to allocate the time spent on allowable activities. Universities and colleges that are approved for Plan Confirmation by the Department of Health and Human Services are also exempt from the time record requirement.
- Budget sections of State plans should confirm that time records are documented.
- Time worked on FSNE must be reported in hours, and not percentage of time to the project.
- A sample form for keeping time and effort documentation is available in Appendix A (see Template **9**). However, States may develop their own form that includes appropriate space to enter hours spent on FSNE, date, and employee and supervisor signatures. Only time spent on FSNE needs to be entered on the form.
- If a University has a procedure for hourly documentation already in place, it may meet the reporting requirement.

- The time and effort forms should be maintained at the work site and available for review/audit for a period of three years.
- Grantees that have Federally approved Random Moments Time Studies need not use time records to document time spent on allowable activities. State agencies may submit alternative methods of calculating time with appropriate justification for consideration by the FNS regional office. The FNS region may consider and approve alternative methods of calculating time that provide a reasonable assurance of accuracy of the time estimate. Time records need not be submitted with the plan but should be maintained by the project for audit.

When accounting for the cost of part-time staff, the total cost, including time not worked (annual and sick leave), must be computed and charged. The official accounting system used for grants and funding arrangements must be used in calculating this cost so that official accounting records reflect all of the revenue and costs of FSNE. The staff person's time spent on FSNE must be documented as specified above.

A.11 Memberships, Subscription, and Professional Activity Cost

Cost of institution memberships in business, technical, and professional organizations are allowable. These memberships, subscriptions, and professional activity costs must be consistent with the effort to promote the provision of quality nutrition services to Food Stamp Program eligibles. Costs of institutional memberships for nutrition personnel that work directly with the FSNE project are reimbursable. The cost to the institution must be prorated according to the percentage of time actually spent by the employee in performing nutrition education activities for the food stamp project. Professional registration or license fees paid by individuals would not be allowable costs since the fees would be considered personal expenses, not institutional expenses.

A.12 Nutrition Education Reinforcement Materials

Nutrition education reinforcement materials refers to a class of goods that are given to **FSP eligibles** or persons closely associated with the FSP (such as staff) containing or conveying nutrition messages and promoting good nutrition practices and increased physical activity. Such items must have a direct relationship to program objectives and the expected behavior change. Other terms that are used to describe these items include memorabilia, souvenirs, promotional items, incentives, and educational extenders. Such items are allowable costs only if they are deemed reasonable and necessary, contain or reinforce nutrition messages, and are of nominal value (\$4.00 or less per item).

FNS could not relate program reinforcement materials to any of the cost items specifically mentioned in the OMB Circular A-87 and A-122. FNS/USDA must, therefore, apply the circulars' general rule for determining the allowability of costs, paramount among which are the reasonable and necessary cost tests.

Program reinforcement materials for nutrition education also must:

- be targeted to **FSP eligibles**;
- have a clear relevance and useful connection to particular FNS/FSP nutrition education messages;

- either contain an educational message or have a use that is directly relevant to reinforce nutrition education messages (example, disposable thermometer to reinforce food safety);
- have value as nutrition education aids;
- be reasonable and necessary in terms of cost and relevance;
- be offered only after weighing and assessing other relative needs and cost effectiveness;
- be of nominal value of \$4.00 or less per item;
- and not be used solely for staff morale boosters.

If the reinforcement material is designed for physical activity promotion, it must be provided in conjunction with relevant nutrition and physical activity message

Examples of Allowable and Unallowable Program Reinforcement Materials

FNS is not able to provide exhaustive lists of specific allowable and unallowable items. However, using the criteria listed in the preceding paragraph, some illustrative examples of allowable and unallowable program reinforcement materials are provided below:

Examples of Allowable Nutrition Education Reinforcement Items:

Calendars and refrigerator magnets that contain important nutrition education messages, measuring cups, measuring spoons or other items of nominal value which reinforce an important nutrition message. Examples of available messages include, Thermy™ the food thermometers' safety message ("It's safe to bite when the temperature is right"), the 5 A Day Campaign, or USDA's EAT SMART. PLAY HARD.™ Campaign.

Examples of Unallowable Nutrition Education Reinforcement Items:

Celebratory items, and items designed primarily as staff morale boosters; items (even of nominal value) that are not reasonable or necessary and/or have no nutrition education message; any program incentive item intended for persons who are not FSP eligible, or with a waiver, those potentially FSP eligible; any item costing more than \$4.00.

A.13 Physical Activity

The Dietary Guidelines for Americans <<http://www.usda.gov/cnpp>> provide the framework for nutrition policy in FNS nutrition assistance programs. The 2005 Guidelines embrace maintenance of a healthy weight and improved fitness level. As such, FNS supports the 2005 Guidelines concept on physical activity. The provisions of OMB Circular A-87 allow FNS to make reasonable judgments as to what is necessary and reasonable to deliver nutrition education. Given the Dietary Guidelines for Americans, the inclusion of physical activity promotion as a part of the FSNE is an allowable expenditure.

The following is guidance on what constitutes allowable FSNE costs in support of the physical activity guideline in the Dietary Guidelines for Americans. Essentially, such allowable costs are limited to activities that educate about and promote physical activity,

such as providing FSP eligibles with information and encouragement to exercise, a brief exercise demonstration, and referral to local resources.

It is recommended that State agencies balance program goals for promoting and supporting physical activity with other competing priorities, cost accountability issues, and liability concerns. The latter is crucial because of the risks associated with engaging in physical activity, which must be seriously considered.

The following form the basic principles of FNS policy on physical activity:

- Educational and program materials developed to promote and reinforce physical activity for all target audiences should include messages that link nutrition and physical activity, such as Eat Smart. Play Hard™.
- All programming such as workshops, conferences, and trainings that encourages physical activity must include a focus primarily on promotion of healthy eating behaviors. Activities may include one-time physical activity demonstration for FSP eligibles and training for staff to develop skills and to help FSP eligibles.
- FNS program cooperators may use nutrition education funds to develop nutrition education and physical activity materials that are reasonable and necessary.
- Existing materials, especially existing FNS materials such as Team Nutrition, Loving Support, Eat Smart. Play Hard™, etc., must be used and/or adapted whenever possible rather than developing new materials. Purchase and use of existing successful model interventions developed by others would be preferable to developing new materials. If new materials are developed, documentation of why existing materials are inadequate is required.
- FNS program cooperators are encouraged to coordinate with community, faith-based, youth and recreational organizations, and others whose primary mission is to make regular opportunities for physical activity accessible and to make a listing of these resources available to Program eligibles.

Examples of Unallowable Physical Activity Education and Promotion Costs

Incentives and reinforcement items must be reasonable and necessary based on established cost principles (OMB circular A-87, A-122 and A-21) and criteria of specific nutrition assistance programs and may not exceed \$4.00 per unit. Costs incurred for health club or gym memberships, dues, equipment, (such as bicycles, treadmills, stair steps, weights, and the like); facilities (rental or modifications); ongoing classes, exercise leaders for ongoing exercise classes are not allowed. Note that the educational reinforcement items meeting the definition in A.12 above are permitted when they are of nominal value (\$4.00 or less per item).

Examples of Allowable Physical Activity Education and Promotion Costs

FSP State agencies may make physical activity education and promotion coupled with nutrition education available to FSP eligibles in a variety of economical ways.

The development of educational materials, to teach physical activity concepts and to reinforce the health benefit of physical activity, is an allowable cost when these activities also promote nutrition education.

As customary, before developing new materials, look to resources available through FNS and other Federal and State sources, including other credible sources. If new materials are needed, justify their development. Also, when developing materials, we recommend the utmost care be taken in the assessment of the target audience and its needs in the accuracy of physical activity statements and advice is strongly recommended. A certified physical fitness professional should be consulted throughout the development phases of these materials. The cost of such consultation is allowable if it meets a reasonable and necessary test.

Purchases of educational materials promoting physical activity for FSP eligibles are allowed. Examples of educational materials include brochures, newsletters, posters, public service announcements, and audiotapes, videotapes, and DVDs. These materials may be purchased or obtained free from reliable sources such as government organizations, physical activity associations, or other authorities on the subject.

Physical activity education and promotion as part of nutrition education sessions in the FSP may include provision of advice, demonstrations (instructional in nature, and not for ongoing classes), and community resource information, (such as a free local fitness event) in order to encourage Program eligibles to engage in regular physical activities. Consistent with A.12 above, program reinforcement items that are reasonable and necessary to reinforce increased physical activity, and that cost \$4.00 or less are allowable.

Additional examples of acceptable physical activity promotion may include:

- Information on local sites where FSP eligibles can access a diverse range of low or no-cost activities appropriate for different ages and physical abilities.
- Physical activity bulletin boards or displays around the food stamp offices, clinics or community.
- Referral to library or web site resources.
- Development and provision of information and resource lists to FSP eligibles on how to promote safe and enjoyable physical activities. This information may also be available from:
 - Affiliates of voluntary health organizations (e.g., the American Heart Association).
 - State and local health departments.
 - Governor's Councils on Physical Fitness and Sports.
 - National Fitness Coalition
 - Coalition for Promotion of Physical Activity
 - State associations for health, physical education, recreation, and dance.
 - National Centers for Chronic Disease Prevention and Health Promotion.
 - Materials can be ordered in bulk from:

The President's Council On Physical Fitness and Sports
200 Independence Avenue SW
Room 738-H
Washington, D. C. 20201-0004
www.fitness.gov
www.presidentschallenge.org

The American Dietetic Association
National Center for Nutrition and Dietetics
216 West Jackson Boulevard
Chicago, Illinois 60606-6995
www.eatright.org

- Another source of information is:

National Recreation and Park Association
22377 Belmont Ridge Road
Ashburn, Virginia 20148-4501
<http://www.nrpa.org/>
Phone: 703-858-0794

A.14 Medical Nutrition Therapy

This is not an allowable cost. Medical nutrition therapy is not within the scope of the FSP. Since this activity is an unallowable cost for the Federal share of costs, it is also not allowable for use in meeting the State match. If a food stamp educator becomes aware of the need for an individualized diet or meal plan, the educator should refer to a local physician or dietitian.

Allowable FSNE includes those health promotion activities and interventions aimed at primary prevention of disease. These health promotion activities should be designed to help **FSP eligibles** establish and maintain active lifestyles and healthy eating habits. Primary prevention includes activities to help **FSP eligibles** prevent or to postpone the onset of chronic disease by establishing more active lifestyles and healthier eating habits.

Secondary prevention interventions and medical nutrition therapy are not allowable FSNE expenditures. Secondary prevention interventions include activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. See also Section A.7: Medical Equipment & Clinical Health Assessments. (See Definitions in Appendix D for a fuller discussion of medical nutrition therapy and secondary prevention interventions.)

A.15 Breastfeeding

All FSNE activities that address the topic of breastfeeding must be planned and implemented in collaboration with the State WIC agency and State Breastfeeding Coordinator. The WIC program should have the lead and primary role in all breastfeeding activities with FSNE supplementing existing WIC activities. A written **agreement (e.g., a Memorandum of Understanding)** stating the degree of collaboration and the specific

responsibilities of WIC (i.e., staff, duties, and time) and the State should be included in the State FSNE Plan. **This agreement must be signed by all collaborating agencies.**

A.16 Travel and Meeting or Conference Attendance

Travel expenditures are a variable cost. In order to be considered for funding, the request must provide a direct and clear link to providing quality nutrition education for food stamp recipients and those eligible.

- **Travel Destination** – Travel requests must be identified for both in-state and out-of-state purposes.
- **Travel Purpose and Justification**
 - States must justify the purpose of the travel request.
 - States must describe how the travel request supports the State's FSNE goals and objectives.
 - States must demonstrate how they will disseminate the information obtained to both, in-state educators and collaborators and in-state food stamp office staff.
- **Number of Staff Attending**
 - Identify the number and type of staff making the travel request.
 - Justify the number and type of staff making the travel request.
 - For attendance at National level conferences, the request should be limited to no more than 4 staff persons per State.

Per Diem Rates - The standard requirements that State or Federal per diem rates must be applied. In addition all travel restrictions found in the grant circulars (i.e. no first class tickets, etc) must be followed.

A.17 Prorating Costs of Nutrition Education Activities

When a broader audience than those described in Table II, page 18, benefits from a nutrition effort that is otherwise allowable under FSNE, FNS may allow prorated costs that reflect FSNE's share of the total cost. In these situations, the calculation of FSNE's share of the total cost is based on the number likely FSP eligibles (persons at or below 130% of poverty guidelines/thresholds with the exceptions noted in Table II on page 18) that will receive the nutrition education relative to the total population to be reached. For example, if a FSNE project will reach 100 persons and 20 of these persons have gross incomes at or below 130% of poverty guidelines, then 20% of the total costs may be counted as FSNE costs. The FSP may then reimburse the State for 50% of the FSNE costs. In other words, FSP Federal funds would reimburse half of 20% of the total costs of this project or 10% of the total project.

States must show how prorated costs were calculated, fully describe the nature of such costs and demonstrate the value of the proposed activity to FSNE. Since activities that target general audiences are often not designed with the needs of FSP eligibles in mind, the State must justify how the activity is a good vehicle for reaching FSP eligibles and changing their nutrition-related behaviors.

A.18 College/University Students

Most able-bodied students ages 18 through 49 who are enrolled in college or other institutions of higher education at least half time are not eligible for the FSP and therefore not eligible to receive FSNE. However, students may be able to get food stamp benefits (and participate in FSNE) if otherwise income eligible and they:

- Get public assistance benefits under a Title IV-A program;
- Take part in a State or federally financed work study program;
- Work at least 20 hours a week;
- Are taking care of a dependent household member under the age of 6;
- Are taking care of a dependent household member over the age of 5 but under 12 and do not have adequate child care to enable them to attend school and work a minimum of 20 hours, or to take part in a State or Federally financed work study program; or
- Are assigned to or placed in a college or certain other schools through:
 - A program under the Workforce Investment Act of 1998,
 - A program under Section 236 of the Trade Act of 1974,
 - An employment and training program under the Food Stamp Act, or
 - An employment and training program operated by a State or local government.
 - Also, a single parent enrolled full time in college and taking care of a dependent household member under the age of 12 can get food stamps if otherwise eligible.

An exclusivity waiver is required for FSNE activities that do not exclusively serve students that meet the criteria outlined above.

B. Sources of State Share Program Cost

B.1 Private, Third-Party, In-kind Donations (Non-cash Outlays)

The FSNE State plan is approved for a specified level of funding. The Federal government reimburses the State for 50 percent of allowable costs incurred by the State. The Federal government is authorized to reimburse a State agency only for actual expenditures incurred. Because the value of private, third party, in-kind donations, including volunteer services, do not represent any State expenditure or outlay, they are not considered as a cost to the program, and thus are not reimbursable.

As specified under 7 CFR 277.4(e), the value of services rendered or the value of goods (i.e., in-kind) donated by private, third parties, including volunteer services, are not allowable for reimbursement purposes under the FSP. However, State agencies are not prohibited from accepting private, third party cash donations.

B.2 Private, Third-Party, Cash Donations

Private, third party cash donations are not generally allowable for reimbursement purposes. However, the State agency may request a waiver. (See A.3 for Waivers)

B.3 Other Federal Funds

The State agency's share of program costs may not include funds paid by the Federal government under another assistance agreement unless authorized under that agreement and its laws or any non-Federal funds contributed for another Federally-assisted program unless authorized by Federal legislation. Consequently, Federal funds provided by USDA's Cooperative State Research Education and Extension Service (CSREES) to the 1862 and 1890 Land Grant Universities or to the State's Cooperative Extension Service (and any State or non-Federal match for those Federal funds) may not be used as part of the State agency's share of FSP costs. However, certain Federal legislation supporting funding to Indian Tribal Organizations (ITO) contains "other Federal laws notwithstanding" language which allows tribal governing bodies to use Federal funds as matching to receive other Federal funds. An ITO that chooses to submit a nutrition education plan for inclusion in the State plan can use Federal funds as a local source of matching to request reimbursement for food stamp administrative funds.

In such circumstances, the State agency must provide assurance that the source of local matching funds is a Federal grant containing the "notwithstanding" language, and must clearly specify the intention to use Federal funds, the amount of the funds, the Federal agency source, and the citation that authorizes those Federal funds to be used as a match for other Federal funds. Also, a copy of the grant agreement between the ITO and the Federal agency must be available for review.

C. Other Miscellaneous Issues

C.1 Federal Royalty Rights

The Food and Nutrition Service reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, photocopies, illustrations, computer programs such CD-ROM and related source codes, literature, or other products produced with FSP funds for government purposes. The State and local agencies may sell videos, photocopies, illustrations or literature to other States for FSNE purposes at the cost of reproduction, plus shipping and handling. If a State agency (or local agency) realizes a profit from the sale of nutrition education materials, [videos, literature, etc. paid with Federal dollars], it must report the amount to FNS as program income on the SF-269 form. Any program income earned through the sale of print and audiovisual materials produced under the grant must be used to reduce the cost of the grant to FNS. Prior to calculation of the reimbursement levels for State and Federal shares, total costs must be reduced by the amount of Program Income earned. The gross amount of Program Income may be reduced by the cost of producing that income. For example, re-production costs may be deducted from the gross amount of Program Income.

C.2 Disclosure and Sharing of Case File Information

Under the provisions of both the Food Stamp Act of 1977, as amended, (the Act) and Food Stamp regulations, case file information on FSP recipients is considered confidential and may not be released unless certain conditions are met. Section 11(e)(8) of the Act provides a limited exception to the confidentiality provision. Disclosure of information obtained from applicant households may be made only to persons directly connected with the administration of FSP.

Previous guidance noted that the Expanded Food and Nutrition Education Program, administered by the USDA Cooperative Extension Service, met the exception provision of the Act and could therefore request certain recipient information from the State agency. This was not intended to limit the exemption provision to this Program or agency. Any organization that has a legal agreement with the State agency, may, upon request to the State FSP agency, be permitted access to recipient information. Since the type of information requested may require State designed ad hoc reports, it is best to not request local offices to provide information. Request examples may include non-financial information such as name of head of households with children, address, telephone numbers, or address labels for all elderly by zip codes. The information may be released solely for administration of the FSP. In this case, this means for assistance in targeting and delivering nutrition education to food stamp applicants and participating households. The receiving organization must assure that the information is shared only with relevant persons for the purpose of the targeting and delivering nutrition education, and must protect it from disclosure to other parties. Each State agency will determine the scope and type of information, based on its judgment, that may be released for purposes of providing nutrition education to applicable households.

C.3 Scholarships and Tuition

OMB Circular A-21 makes a distinction between scholarships, fellowships, and other similar financial transactions, and tuition remission and similar work/study payments. For

scholarships, costs may only be charged if (1) the purpose of the scholarship is for training of selected students, and (2) approval is granted by the grantor agency. There would need to be a necessary and reasonable judgment for approval of any scholarship payment shown as a cost to FSNE. In general, this is not a cost that would be necessary and reasonable for the purposes of this grant. In the event the scholarship is based on research activity, FNS would normally not accept the cost as being necessary and reasonable. The primary function of FSNE is teaching nutrition education to food stamp recipients. While basic research may be a commendable activity for developing new methods or data, it is beyond the basic purpose of this grant.

Tuition remission on the other hand may be allowable in whole or in part, depending on the situation. The criteria for approval are:

1. There is a bona fide employer-employee relationship between the student and the institution for the work performed.
2. The tuition or other payments are reasonable compensation for work performed and are conditioned explicitly upon the performance of necessary work. Again any research activity should be carefully reviewed and in most cases not approved due to the fundamental differences in our grants and other grants provided for nutrition education.
3. It is the institution's practice to similarly compensate students in non-Federally funded activities as well as Federally funded grants.

Students who are working on FSNE under a tuition remission situation must account for their time, as would any full time or part time staff. The financial review of this charge must take into account both the type of work performed and the number of hours worked. As with any charge, tuition remission can only be charged by the percentage of time that the student or employee worked on FSNE. If the student is working 50% of their time on FSNE, only 50% of the tuition may be charged to FNS. Again, a necessary and reasonable judgment must be made as to purpose of the work and its impact on FSNE.

C.4 Examples of Allowable and Unallowable Costs

The following table provides some examples of allowable and unallowable costs.

ALLOWABLE	UNALLOWABLE
Literature/Materials/Audiovisuals	
<ul style="list-style-type: none"> • The purchase of FNS nutrition education/promotion materials that address FSNE topics and are for use with FSP eligibles. • The purchase of other nutrition education materials, when there are no FNS materials available that address FSNE topics and will be used with persons eligible for the FSP. • The production of nutrition education materials, for which there is no other existing comparable material, that support the State's goals and objectives for FSNE and will be distributed to FSP eligibles. It is encouraged that States collaborate with other FNS programs on the messages conveyed in and the costs of education materials. The State agency must describe the method used for allocating costs between the programs. 	<ul style="list-style-type: none"> • Costs for any nutrition education materials that have already been charged to another Federal or private program or source. • Any material that endorses or promotes brand name products or retail stores. • Manufacturer's or store (cents off) coupons. • Influencing a store's pricing policy. • Any activity or material to lobby or influence Federal, State, or local officials to pass or sign legislation or to influence the outcomes of an election, referendum or initiative. • Negative written, visual, or written expressions about specific foods, beverages or commodities.
Social Marketing Campaigns	
<ul style="list-style-type: none"> • Local radio and television announcements of nutrition education events for food stamp eligibles. • Appropriate social marketing campaigns that target nutrition messages to food stamp eligibles and are delivered, with an approved exclusivity waiver, in areas/venues where at least 50 percent of persons have incomes equal to or less than 185% of poverty guidelines or thresholds. 	<ul style="list-style-type: none"> • Social marketing campaigns that target the general population. In some instances, prorated costs based upon the numbers of likely FSP eligibles (\leq 130% of poverty guidelines/thresholds, with certain exceptions) that will be reached with the campaign may be allowed. • Nutrition education messages which convey negative messages or disparage specific foods, beverages or commodity, or which are not consistent with the Dietary Guidelines for Americans.

ALLOWABLE	UNALLOWABLE
Equipment	
<ul style="list-style-type: none"> • Purchase of office equipment. A county can donate equipment and use fair market value; however, any fair market value has to be adjusted to reflect Federal funding provided for the equipment. (This can be arrived at by multiplying the fair market value times the State's percentage share invested in the equipment.) • Equipment shared with non-FSP users when cost-shared with those users. • Kitchen appliances only with justification of reasonable and necessary need. 	<ul style="list-style-type: none"> • Electronic equipment that exceeds prior approval thresholds (i.e., \$5,000) unless such prior approval is received from FNS. • Medical equipment.
Food Samples, Supplies and Provisions	
<ul style="list-style-type: none"> • Cost of food for recipe/taste testing purposes and cost of kitchen equipment and supplies necessary for food storage, preparation and display of food prepared for demonstration purposes. • Food <u>samples</u> associated with a nutrition education lesson. 	<ul style="list-style-type: none"> • Ongoing snack or food service. • Meal size portions or complete meal service. • Cost of food provided as groceries or supplemental food.
Nutrition Education	
<ul style="list-style-type: none"> • Classroom setting (salaries, space, equipment, materials) for food stamp eligibles on nutrition related topics (e.g., food budgeting, preparation, safety). Primary purpose of class must be to provide nutrition education. If nutrition education is included with other topics, only that portion of class pertaining to nutrition education is an allowable cost. Schools must be public government entities for in-kind charges. • Physical activity demonstration, promotion, referral that includes a nutrition message. 	<ul style="list-style-type: none"> • Classes that are designed to provide case management or "life skills" training (e.g., classes on English as a second language, parenting, child development, crisis management, rental information). • Medical nutrition therapy and secondary prevention interventions (Refer to Appendix D, Definitions). • Weight loss classes, individualized meal plans, obesity treatment programs, etc. • Ongoing physical activity and exercise classes, equipment or facilities. (Refer to Appendix C: Physical Activity Cost Policy Section). • Clinical health screenings (i.e., cholesterol testing, body mass index and blood glucose testing, etc). • Distribution of nutrition education reinforcement items over \$4.00.

ALLOWABLE	UNALLOWABLE
Nutrition Education Continued	
<ul style="list-style-type: none"> • The pro rata share of costs of classes that are provided in conjunction with another program (e.g., WIC), provided the State agency describes the method for allocating costs between the programs. • Breastfeeding education, promotion and support which is coordinated with WIC and which supplements and complements WIC services, rather than supplanting them. • Activities where the primary objectives pertain to allowable nutrition education but brief FSP outreach messages are also shared with FSNE participants. 	<ul style="list-style-type: none"> • Nutrition education costs that are charged to another Federal program (e.g., WIC, EFNEP, Head Start, etc.) • Breastfeeding education, promotion and support that duplicates or otherwise is provided for under other funding sources such as WIC, EFNEP, or Head Start. • Education provided to incarcerated or institutionalized persons that are not eligible for the FSP (i.e., persons in jails, prisons, nursing homes, mental institutions etc.). • Most able-bodied students ages 18 through 49 who are enrolled in college or other institutions of higher education at least half time are not eligible for the FSP and therefore not eligible for FSNE. For information on students that may be eligible: http://www.fns.usda.gov/fsp/applicant_recipients/students.htm • Activities where the primary objective(s) is to conduct outreach efforts for the FSP or other programs.
Space Allocation	
<ul style="list-style-type: none"> • Space allocated between programs in which the plan for the space/cost allocation between programs is documented and the costs are tracked. • Space donated by local school districts, but only the cost of space based on depreciation or use allowance. 	<ul style="list-style-type: none"> • In-kind charges for space that is donated by a private third-party or costs that are fully funded by another program (e.g., USDA WIC and EFNEP programs), or the FSP, i.e. FSP county waiting room). • Commercial rental rates cannot be used for government owned spaced.

Staff and Training Costs	
<ul style="list-style-type: none"> • FSNE-related training for program delivery staff. The time volunteers of a public agency spend performing FSNE-specific duties. Time must be charged at a rate commensurate with the duties being performed. • Staff time spent delivering nutrition education to food stamp eligibles. Time must be charged at a rate commensurate with the duties being performed. • General briefings to community health care providers serving low-income communities about FSNE services in the community. 	<ul style="list-style-type: none"> • The time volunteers of a non-public agency (e.g., faith-based organizations, many food banks, etc.) spend performing FSNE specific duties. • A physician's time spent distributing nutrition flyers at health fairs when charges are based on a rate commensurate with his/her credentials as opposed to the duties he/she is performing. • University courses that are not relevant to the practical delivery of nutrition education to food stamp eligibles. • Training or development costs of food service workers or others not directly associated with delivery of FSNE.
Costs Associated with Other Activities	
<ul style="list-style-type: none"> • Reimbursement for personal costs (such as child care, meals, lodging, and transportation) for recipients of FSNE to actively participate in focus groups, needs assessments and advisory groups to inform and improve FSNE effectiveness. 	<ul style="list-style-type: none"> • Lobbying. • Costs associated with surveillance or surveys of the general population that are not prorated based on the number of likely FSP eligible respondents (persons with incomes less than or equal to 130% of poverty guidelines/thresholds, with certain exceptions). • Costs associated with supporting and maintaining environmental or system changes in the community, such as staffing, infrastructure, equipment, space, land, construction or supplies. • Money, vouchers or passes provided to FSNE recipients to offset personal costs incurred so that they may attend nutrition education classes (e.g., for childcare and transportation expenses). • Childcare or transportation services provided for FSNE recipients in conjunction with FSNE activities. • Reinforcement items over \$4.00. (Refer to Appendix C Cost Policy Section- Program Reinforcement Items)

Appendix D: Definitions

These definitions are for clarification of terms that may be used throughout the guidance.

Activity refers to actual work performed by program personnel to implement objectives.

Applicant refers to person/households who have actually applied for the FSP.

Behavior indicates action rather than knowledge or attitudes.

Behaviorally Focused Nutrition Messages are those that are (a) related to healthy food choices, for example, eating lower fat foods, adding one fruit each day, and switching to whole grain breads; (b) related to other nutritional issues, for example encouraging breast feeding practices, or physical activity (c) related to the environmental impact of dietary practices, including safe food handling, promoting community walking groups (d) related to food shopping practices that increase purchasing power and availability of food including using store coupons, joining store clubs for added discounts, and purchasing in bulk, and (e) food security such as applying for nutrition assistance programs (i.e. WIC, FSP, Child Nutrition Programs, Food Distribution Programs, etc).

Budget Projection, FNS-366A is a budget report submitted by State agencies to FNS to request the amount of annual funds needed to operate the FSP. It is the form used to support the annual funding request. Any need for additional funds require a revised 366A.

Cognizant Federal Agency refers to the Federal agency that has been identified by OMB that is responsible for establishing indirect cost rates. For more information see item A.2 Indirect Cost Rate in Appendix C.

<u>Organization</u>	<u>Cognizant Federal Agency</u>
State Public Assistance Agencies	Dept. of Health and Human Services (DHHS)
All Other State agencies	Federal agency identified by OMB
Educational Institution	Department of Education, Department of Defense-Naval Research or DHHS, depending on which provided more Federal funds over the last 3 years
Nonprofit Organization	Normally the Federal agency with the largest dollar value of award with the organization

Direct Contact is a face-to-face contact with a person or a household to deliver nutrition education, an educational class, workshop, group discussion, one-on-one intervention, etc.

Effectiveness is the extent to which pre-established objectives are attained as a result of program activity, as indicated by performance measures.

Fiscal Year is the Federal Fiscal Year that runs from October 1st of one year through September 30th of the following year.

Food Stamp Program Eligibles are persons that meet criteria for participation in the Food Stamp Program as described in Federal legislation and regulations. Persons that participate in the formal Food Stamp Program certification process and are determined eligible (e.g., Food Stamp Program participants) clearly meet these criteria. Some persons that are eligible for the Food Stamp Program do not apply. These non-participating eligibles are not as easy to identify because they typically have not participated in a formal certification process. Food Stamp Program Eligibles are the recognized target audience for Food Stamp Nutrition Education.

Full-Time Equivalent (FTE) employment, as defined by the Federal government, means the total number of straight-time hours (i.e., not including overtime pay or holiday hours) worked by employees divided by the number of compensable hours (2,080 hours) in the Fiscal year. According to this definition, annual leave, sick leave, compensatory time off and other approved leave categories are considered “hours worked” for purposes of defining FTE employment. States may define FTEs differently than the Federal standard. States may use their own definition of FTEs in their FSNE Plan, but must clearly state the definition and the basis for the calculation.

Grantee means the agency of the State responsible for administering the Food Stamp Program. Federal funds are paid to this agency for all food costs, and for 50 percent of all non-food expenditures, including program administration and nutrition education. The grantee in turn takes agreements with local agencies (sub grantees) to conduct nutrition education activities. Federal funds are made available to pay for half of all allowable nutrition education costs on a reimbursement basis.

Indirect Contact is the delivery of nutrition education to a household or a person through an indirect and generalized strategy, such as public service announcements, billboards, newsletters, and social marketing.

Lobbying is any activity or material to influence Federal, State, or local officials to pass, or sign legislation or to influence the outcomes of an election, referendum, or initiative.

Low-income Persons are people participating in or applying for the Food Stamp Program, as well as people with low financial resources defined as gross household incomes at or below 185 percent of poverty. National School Lunch Program data on number of children eligible for free and reduced price meals, which represents children in families with incomes at or below 185 percent of poverty, or Census data identifying areas where low income persons reside, are available data sources that can be used to identify low income populations. Participation in WIC may also be used as a proxy for low income since WIC participants have gross family incomes below 185 percent of poverty.

Marketing Orders generally refer to USDA or State programs that support prices and consumption of various fruits, vegetables, milk, eggs and meat programs. Funds are collected from the producers and used to publicize the item in question. Limits to production are also enforced. (For example both Florida and California have orange marketing order boards). With some constraints, money and services provided by marketing boards can compromise an allowable component of a State

Plan. However, the promotion of a specific item (for example, only oranges) is not an allowable expense.

Medical Nutrition Therapy Services means the assessment of the nutritional status of patients with a condition, illness, or injury (such as diabetes, hypertension, gout, etc.) that puts them at risk. This includes review and analysis of medical and diet history, laboratory values, and anthropometric measurements. Based on the assessment, nutrition modalities most appropriate to manage the condition or treat the illness or injury are chosen and include the following:

- Diet modification and counseling leading to the development of a personal diet plan to achieve nutritional goals and desired health outcomes.
- Specialized nutrition therapies including supplementation with medical foods for those unable to obtain adequate nutrients through food intake only; parenteral nutrition delivered via tube feeding into the gastrointestinal tract for those unable to ingest or digest food; and parenteral nutrition delivered via intravenous infusion for those unable to absorb nutrients.

Medical Nutrition Therapy Services are not allowable FSNE costs.

Needs Assessment is the process of identifying and describing the extent and type of health and nutrition problems and needs of individuals and/or target populations in the community.

Non-Federal Public Agency is a State or local government agency or entity, including State universities and colleges, and instrumentalities of the State, such as organizations that are chartered by State or local governments for public purpose.

Nutrition Education Plan is an official written document that describes FSNE services to be provided. It should clearly describe goals, priorities, objectives, activities, procedures used, and resources including staff and budget, and evaluation method.

Outreach is providing information or assistance to individuals who might be eligible for the Food Stamp Program in order to help them make an informed decision whether to apply for the Program. State FSP agencies seeking Federal funding for Outreach activities may annually submit an Outreach plan to FNS for approval.

Plan Confirmation means a time and effort reporting process that is an acceptable alternative to time studies or time records for universities and colleges only. The use of Plan Confirmation is allowable only for those schools that have submitted a request to the Division of Cost Allocation, DHHS, and have had an audit completed which supports the use of Plan Confirmation. Universities which have pending requests, and for whom audit approval has not been received, will be required to continue to use time records to account for charges to FNS (Normally this will not be an issue since audits normally occur at least every two years). For further information refer to OMB Circular A-21. If approval through the audit process has not occurred, the Division of Cost Allocation, DHHS, should be contacted as follows:

The U.S. Department of Health and Human Services

Office of the Secretary
Division of Cost Allocation
200 Independence Ave, S.W.
Washington, D.C. 20201
Telephone: 202-401-2808
Toll Free: 1-877-696-6775

Poverty Guidelines are an administrative version of the Federal poverty measure and are issued annually by the Department of Health and Human Services in the Federal Register. Sometimes referred to as the Federal Poverty Level, these guidelines are often used to set eligibility for certain programs. <http://aspe.hhs.gov/poverty/index.shtml>.

Poverty Thresholds are the statistical version of the Federal poverty measure and are released annually by the Census Bureau. They are used to estimate the number of persons in poverty in the United States or in states and regions. <http://www.census.gov/hhes/www/poverty.html>

Project means a discrete unit of nutrition education intervention at the local level, which is distinguished by a specifically identified low-income target population. The term “Project” is intended to apply to a geographic area for the sole purpose of developing and supporting a request for an exclusivity waiver. Census data by zip code or census tract are sources of documentation.

Public Education Outreach Message is a brief message providing information on the availability, benefits, and application procedures for the Food Stamp Program, preferably with information on local application sites, (or a toll-free number, or other useful information on how to find services). When FSNE is provided to low-income persons not participating in the Food Stamp Program, by virtue of approved waivers, a critical component of the nutrition message must be to provide an educational message about the availability and benefits of the program and how to apply. This should be done “in the context” of nutrition education, meaning the Food Stamp Program should routinely be referenced in nutrition education sessions and on materials as an important source of nutrition assistance to help low income persons achieve a better diet.

Random Moment Time Studies are time studies conducted through the use of a sampling methodology rather than through a log of each time period worked by the employee. The studies are used to determine the percentage of time worked by activity or program. The purpose of the study is to allocate the cost of time worked among the various activities and funding sources.

Secondary Prevention Interventions mean activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. Secondary prevention interventions are not allowable costs in the Food Stamp Program.

Social Marketing is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior. Although social marketing efforts often make use of television, radio ads, videos, and brochures, these materials by themselves do not constitute social marketing. Rather, social marketing entails a comprehensive program in which these materials are employed as part of multiple tactics to reach a target audience.

State Agency means the agency of State government, including the local offices thereof, which is responsible for the administration of the Federally aided public assistance programs within the State, and in those States where such assistance programs are operated on a decentralized basis, it includes the counterpart local agencies which administer such assistance programs for the State agency.

State Nutrition Action Plans are statewide nutrition education plans for the USDA nutrition assistance programs. These plans focus on a single goal and promote collaboration and use of integrated nutrition education approaches across FNS Programs to connect the efforts and resources of all the USDA programs to achieve that goal. During February 2003, State teams consisting of key staff representing USDA nutrition assistance programs developed the State Nutrition Action Plan for their state. The teams are working together to continue the development and implementation of the action plans.

Sub grantee means the organization or person to which a State agency, as grantee, takes an agreement to conduct nutrition education activities. Federal funds reimburse the grantee for half of its allowable administrative costs, including nutrition education. The grantee in turn generally will reimburse sub grantees for half of their allowable costs. The sub grantee is accountable to the grantee for the use of funds provided, and the grantee is accountable to the Food and Nutrition Service for the use of all Federal funds provided.

Target Audience refers to Food Stamp Program Eligibles.

Appendix E:

List of Abbreviations

CFR- Code of Federal Regulations
EFNEP- Expanded Food and Nutrition Program
FDPIR- Food Distribution Program on Indian Reservations
FSNC- Food Stamp Nutrition Connection
FSNE- Food Stamp Nutrition Education
FNS- Food and Nutrition Service
FSP- Food Stamp Program
FY- Federal Fiscal Year
ITO- Indian Tribal Organization
MOU- Memorandum of Understanding
NAL- National Agricultural Library
OGC- U.S. Department of Agriculture Office of General Council
OMB- Office of Management and Budget
PDF- Portable Document Format
PSA- Public Service Announcement
SNAP- State Nutrition Action Plan
SSI- Supplemental Security Income
TANF- Temporary Assistance for Needy Families
WIC- Special Supplemental Food Program for Women, Infants and Children
USDA- United States Department of Agriculture

Appendix F:

Food Stamp Nutrition Connection Web Site

The Food and Nutrition Service (FNS) and the National Agriculture Library's Food and Nutrition Information Center (FNIC) sponsor an online resource, called the **Food Stamp Nutrition Connection**. This web site is designed to improve access to Food Stamp Program nutrition resources. Educators nationwide can use this site to identify curricula, lesson plans, research, training, tools and participant materials. The Food Stamp Nutrition Connection is available at www.nal.usda.gov/foodstamp

At the web site, you will find nutrition tools and information specifically addressing the needs of the low-income audiences. This resource is not restricted to materials developed with funding from the Food Stamp Program. Further, materials on the site are reviewed for basic quality, but their inclusion on the site does not constitute endorsement by USDA. Major sections of the site include a Training Center, Resource Library, Hot Topics A-Z and Program facts.

We encourage you to subscribe to FSNC-Talk, an electronic mailing list for national, regional and State, and local Food Stamp Program nutrition education contacts. Information about how to join the list is available on the Food Stamp Nutrition Connection web site.

Also, you're invited to share your materials with FNIC so that others may benefit from your experience and expertise. A hard copy and an electronic copy of each document are preferred. Please submit nutrition education or training materials such as videos, curricula, games, handouts, booklets, displays, web-based modules, and lesson plans to the Food Stamp Nutrition Connection Resource System for use on the Web site or in the database. For details on how to submit materials, visit the Sharing Center on the Food Stamp Nutrition Connection Web site at this address: http://www.nal.usda.gov/foodstamp/Library/sharing_part1-2.html. You may also send an email to: FSNC@nal.usda.gov or call (301) 504-5414. If you would like to donate a copy of a new resource for review, please address it to:

Food Stamp Nutrition Connection
Food and Nutrition Information Center
USDA/ARS National Agricultural Library
10301 Baltimore Avenue, Suite 105
Beltsville, MD 20705-2351

Or you may use the following form as a handy way to submit items.

Continuing updates and new developments are planned for the Food Stamp Nutrition Connection website in the upcoming year-- so check back often for new additions. If you have any questions about the resource system or information provided, contact staff by telephone at (301) 504-5719, by fax at (301) 504-6409, or by e-mail at FSNC@nal.usda.gov



Food Stamp Nutrition Connection Resource Sharing Form

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is PRA#0518-0031. The time required to complete this information will vary based upon one's relationship to the resource being submitted. It is estimated to take 19 minutes to complete the entire survey. This includes time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. If you need help with this form, please contact us. E-mail: FSNC@nal.usda.gov. Telephone: (301) 504-5039. TTY: (301) 504-6856.

Part 1. About You

Please provide your contact information in case we have questions about this resource. View our Privacy Policy at <http://www.nal.usda.gov/policy/privacy.htm>.

1. Your name:
2. Your e-mail address:
3. Which best describes your relationship to the resource you are submitting?
 - ☐ I developed this material (complete sections I-III)
 - ☐ I distribute or handle ordering for this material (complete sections I, II and IV)
 - ☐ I use this resource but I am not the developer or distributor of this material (complete sections I and II)

Part II. Resource Information

Please tell us about the material you are submitting.

1. Resource Title: _____
2. Developer/ Author(s): _____
3. Primary Author's Affiliation: _____
4. Publication/Revision Date: _____ Edition: _____
5. How is this material used?
 - ☐ Consumer Education
 - ☐ Staff Training
 - ☐ Background Information/Research
6. What languages are available?

7. If this resource is available online, please provide the web site address (URL).

8. Briefly, describe your resource.

9. How do we contact the publisher/distributor?

Publisher Name _____

Street Address _____

City _____ State _____ Zip Code _____

Telephone _____ E-mail _____

Part III. Author/ Developer Information

Please share information about how this material was developed.

1. Please describe the target audience.

2. If you used a readability formula to test this material, please provide the following:

name of the formula used _____ score/grade level _____

3. Please describe any pilot studies conducted.

4. Does this material include a validated evaluation tool? ☐ Yes ☐ No

5. What is the funding source for the development of this material?

Comments:

Part IV. Publisher/Distributor Information

1. ISBN number (if applicable): _____

2. Please indicate how this material may be used by other educators.

☐ May copy for educational purposes without prior permission.

☐ Permission needed to copy.

☐ May not copy.

3. How can educators order this material?

4. What is the cost of this material? (price/unit) _____

5. Can this material be ordered in quantity? ☐ Yes ☐ No

6. Describe any bulk discounts available.

Comments:

Thank you for sharing your resource!

If you are completing a printed copy of this form, please return it to:
Food and Nutrition Information Center/FSNC
National Agricultural Library
10301 Baltimore Avenue
Beltsville, Maryland 20705-2351
Fax: (301) 504-6409

Appendix G:
Timeline

March 31, 2005	FY 2006 Guidance Available to States
April 1-August 15, 2005	States May Submit FY 2006 Plans to the FNS Regional Office
August 15, 2005	FY 2006 Plans Due to FNS Regional Office
October 1, 2005	States May Receive Response/Contingency Approval for FY 2006 Plan from Region if plans are submitted in an appropriate format and all necessary data is provided. Plans that are not in the format of the Guidance and/or do not supply data requested in the Guidance may require additional review and hence a longer approval time. Extraneous information and unnecessary documentation may also hinder plan review or result in a denial.
November 30, 2005	FY 2005 Final Report Due to FNS Regional Office
June 30, 2006	Last date for submission of FY 2006 Plan Amendments with New/Significantly Revised Activities to FNS Regional Office
November 30, 2006	FY 2006 Final Report Due to FNS Regional Office